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8 **UNITED STATES DISTRICT COURT**  
9 **WESTERN DISTRICT OF WASHINGTON**  
10 **TACOMA DIVISION**

11 WILL CO. LTD. a limited liability company  
12 organized under the laws of Japan,

13 Plaintiff,

14 vs.

15 KA YEUNG LEE, an individual; YOUHAHA  
16 MARKETING AND PROMOTION  
17 LIMITED, a foreign company; and DOES 1-  
18 20, d/b/a THISAV.COM,

19 Defendants.

**Case No.: 3:20-cv-05802-BHS**

**PLAINTIFF’S MOTION FOR LEAVE  
TO FILE SECOND AMENDED  
COMPLAINT AND MEMORANDUM  
OF POINTS AND AUTHORITIES**

NOTE FOR MOTION:  
May 10, 2024

20 Plaintiff, Will Co. Ltd (hereinafter “Will Co.” or the “Plaintiff”) Moves for motion to  
21 amend their First Amended Complaint (hereinafter this “Motion”) in the above -captioned case  
22 through its counsel, Spencer D. Freeman, The Freeman Law Firm, Inc. and A. Eric Bjorgum of  
23 Karish & Bjorgum, PC (*pro hac vice* application forthcoming).

24 **I. INTRODUCTION**

25 Pursuant to Fed. R. Civ. P. 15(a) and Fed. R. Civ. P. 20, Plaintiff Will Co. respectfully  
26

PLAINTIFF’S MOTION FOR LEAVE TO AMEND - 1

[NO. 3:20-cv-05802-BHS]

**FREEMAN LAW FIRM, INC.**  
1107 ½ Tacoma Avenue South  
**Tacoma, WA 98042**  
(253) 383-4500 - (253) 383-4501 (fax)

1 requests the Court's leave to amend its First Amended Complaint to add newly discovered  
2 websites and to include claims for federal trademark infringement and unfair competition,  
3 dilution and related Washington State law claims.

4 A true and correct copy of the proposed amended complaint is included as Attachment  
5 A to the Declaration of Bjorgum submitted herewith. A true and correct copy of a redlined  
6 version is attached as Exhibit B.

## 7 8 **II. FACTUAL BACKGROUND**

9 Plaintiff is an award-winning Japan based entertainment company which includes a vast  
10 library of full-length adult entertainment movies offered for viewing in a fee-based model.  
11 Plaintiff has filed for and obtained copyright registrations with the U.S. Copyright Office. Will  
12 Co. produces content that is available through dozens of well-known brands. Through these  
13 brands, the content is purchased through a single exclusive licensing agreement with Japan-based  
14 DMM via its online sales portal and through DVD sales. In the Complaint and First Amended  
15 Complaint ("FAC"), Will Co. sought to protect its copyrighted audiovisual works from blatant  
16 infringement by Defendants in the United States.

17 In response to the FAC, Defendants brought a motion to dismiss for lack of personal  
18 jurisdiction. That motion was initially successful, but on appeal, the Ninth Circuit reversed and  
19 announced standards that expanded personal jurisdiction in the realm of Internet-based claims.  
20 Defendants' infringing website operated at the domain ThisAV.com. In recent months, new  
21 "mirror" sites have arisen that are nearly identical to ThisAV.com in every respect, including  
22 code. Furthermore, these sites have all been using Plaintiff's famous brands, which are protected  
23 by service marks and trademarks (the "Marks"). The Marks are registered in Japan and subject  
24 to common law protection in the United States. These uses of Plaintiff's Marks are likely to cause  
25 confusion as to source, sponsorship and affiliation with Plaintiff and are thus actionable under the  
26

1 Lanham Act and related state law claims. Due to the fame of Plaintiff's Marks, these uses are  
2 also actionable as dilution.

### 3 4 **III. ARGUMENT**

#### 5 **A. Courts should freely grant leave to amend and to join parties.**

6 "The court should freely give leave" for a party to amend its pleading when justice so  
7 requires. Fed. R. Civ. P. 15(a). "Rule 20, Fed.Rules Civ.Proc., regarding permissive joinder is  
8 to be construed liberally in order to promote trial convenience and to expedite the final  
9 determination of disputes, thereby preventing multiple lawsuits." 4 J. Moore, et al., Moore's  
10 Federal Practice, §20.02[1J[a], p. 20-5, (3d. ed. 2011) (citing *League to Save Lake Tahoe v.*  
11 *Tahoe Regional Planning Agency*, 558 F.2d 914, 917 (9th Cir. 1977)).

12 "The Supreme Court has instructed the lower federal courts to heed carefully the  
13 command of Rule 15(a), F.R.Civ.P., by freely granting leave to amend when justice so  
14 requires." *Howey v. United States*, 481 F.2d 1187, 1190 (9th Cir. 1973). A court's decision on  
15 granting leave to amend must be guided by the strong federal policy favoring the disposition of  
16 cases on the merits. *DCD Programs Ltd. v. Leighton*, 833 F.2d 183, 186 (9th Cir. 1987)  
17 ("(w]here the underlying facts or circumstances of a case 'may be a proper subject of relief, [a  
18 plaintiff] ought to be afforded an opportunity to test his claims on the merits.'").

19 In exercising this discretion, a court must be guided by the underlying purpose of Rule  
20 15 to facilitate decision on the merits, rather than on the pleadings or technicalities. See *Conley*  
21 *v. Gibson*, 355 U.S. 41, 47-48 (1957). Accordingly, Rule 15's policy of favoring amendments  
22 to pleadings should be applied with "extreme liberality." *United States v. Webb*, 655 F.2d 977,  
23 979 (9th Cir. 1981) (quoting *Rosenberg Brothers & Co. v. Arnold*, 283 F.2d 406 (9th Cir.  
24 1960) (per curiam)).

25 Courts consider four factors when determining whether to allow amendment of a  
26 pleading: prejudice to the opposing party, undue delay, bad faith, and futility. See *Forsyth v.*

1 *Humana*, 114 F.3d 1467, 1482 (9th Cir. 1997); *DCD Programs*, 833 F.2d at 186; *see also*  
 2 *Foman v. Davis*, 371 U.S. 178, 182 (1962). These factors are not equally weighted; the  
 3 possibility of delay alone, for instance, cannot justify denial of leave to amend. *See DCD*  
 4 *Programs*, 833 F.2d at 186; *Morongio Band of Mission Indians v. Rose*, 893 F.2d 1074, 1079  
 5 (9th Cir. 1990). The single most important factor is whether prejudice would result to the  
 6 nonmovant as a consequence of the amendment. *William Inglis & Sons Baking Co. v. ITT*  
 7 *Continental Baking Co.*, 668 F.2d 1014, 1053 (9th Cir. 1981).

8 Here, none of the above four factors are present. First and foremost, there is no  
 9 prejudice to Defendants. April 22, 2024 is the last day to file amended Pleadings, so this  
 10 motion is timely. The facts and claims in the proposed SAC arise from the common set of facts  
 11 outlined in the FAC with respect to the infringing websites. The new websites are identical,  
 12 and the addition of the Lanham Act claims provides further remedies to the behavior already  
 13 alleged in the FAC.

14 Neither side here has commenced discovery, and discovery and other aspects of the  
 15 case will not be significantly different with the addition of the proposed SAC. Plaintiff does not  
 16 anticipate delay resulting from the amendment. Because the factual and legal issues involving  
 17 the Defendants' piracy all relate to the same illegal and blatant copying of Plaintiff's works.  
 18 Discovery issues regarding the identity of Defendants, and the content of their websites, will be  
 19 identical between the FAC and SAC.

20 The final two factors in determining whether to grant leave to amend - bad faith and  
 21 futility - are inapposite here. Plaintiff seeks to amend its complaint in a good faith effort to  
 22 conserve judicial and party resources by joining all claims, parties and identical infringing  
 23 Websites in a single action. This is necessitated by Defendants' illicit behavior.

24 Plaintiff should be allowed to amend its First Amended Complaint to identify additional  
 25 websites and include claims under the Lanham Act and related state law claims.  
 26 Joining the requested sites and allowing the additional claims will promote the goals of judicial

1 efficiency and avoid potentially inconsistent judgments that could result from trying multiple  
2 separate cases involving the same set of facts.

3  
4 **IV. CONCLUSION**

5 For the foregoing reasons, the Plaintiff respectfully requests that the Court grant its  
6 Motion for Leave to file a Second Amended Complaint.

7  
8 DATED: April 22, 2024

**FREEMAN LAW FIRM, INC.**

9  
10  
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Counsel for Will Co Ltd.  
(Moving for Admission pro hac vice)

# **EXHIBIT A**

## **Proposed Second Amended Complaint Red-Lined**

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8 **UNITED STATES DISTRICT COURT**  
9 **WESTERN DISTRICT OF WASHINGTON**  
10 **TACOMA DIVISION**

11 WILL CO. LTD. a limited liability company  
12 organized under the laws of Japan,

13 Plaintiff,

14 vs.

15 KA YEUNG LEE, an individual; YOUHAHA  
16 MARKETING AND PROMOTION  
17 LIMITED, a foreign company; and DOES 1-5  
18 d/b/a THISAV.COM, MISSAV.COM,  
19 MYAV.COM, MISSAV789.com,  
20 VASSIM.COM, and John Does 6-20

21 Defendants.

**Case No.: 3:20-cv-05802-BHS**

**SECOND AMENDED COMPLAINT  
FOR DAMAGES AND INJUNCTIVE  
RELIEF**

**DEMAND FOR JURY TRIAL**

22 Plaintiff Will Co. Ltd. (hereinafter referred to as “Plaintiff” or “Will Co.”) by and through its  
23 counsel of record files this Complaint against Defendants Ka Yeung Lee, Youhaha Marketing and  
24 Promotion Limited, ~~and Does Doe 1-20~~, d/b/a THISAV.COM, MISSAV.COM, MYAV.COM,  
25 MISSAV789.com, VASSIM.COM, and John Does 2-20 (collectively hereinafter referred to as  
26 “Defendant” or “Defendants”).

**PRELIMINARY STATEMENT**

1. Will Co. is an award-winning Japan based entertainment company which includes a vast  
library of full-length adult entertainment movies offered for viewing in a fee-based model. Will Co.

1 sells access to its content ~~in the United States~~ and has filed for and obtained copyright registrations with  
 2 the U.S. Copyright Office. It also owns dozens of trademarks and service marks registered in Japan.  
 3 Will Co. produces content that is available through dozens of well-known brands. Through these  
 4 brands, the content is purchased through a single exclusive licensing agreement with Japan-based  
 5 DMM via its online sales portal and through DVD sales. By this lawsuit, Will Co. seeks to protect its  
 6 copyrighted audiovisual works and trademark-related rights from blatant infringement by Defendants  
 7 in the United States.

8 2. The conduct that gives rise to this lawsuit is egregious and willful. Defendants own and  
 9 operate websites engaged in the business of copying and distributing infringing audiovisual works.  
 10 ~~Under the guise of acting as a distributor of “user-generated content,” Defendants in fact~~ Defendants  
 11 are directly and knowingly involved in the trafficking of thousands of pirated works – including many  
 12 works owned by Will Co. Moreover, though Defendants are not “service providers,” not engaged in  
 13 the storage of content at the direction of users, and thus ~~are~~ not entitled to any of the safe harbors  
 14 afforded under Section 512 of the Digital Millennium Copyright Act (“DMCA”) (17 U.S.C. § 512),  
 15 Defendants do not comply with their obligations under the DMCA. ~~Instead,~~ Plaintiff has sent takedown  
 16 notices in attempts to remove over 1.5M links to infringing use of its works. Defendants systematically  
 17 refuse to comply with proper and compliant DMCA takedown notices.

18 3. Defendants earn income through driving traffic to their website(s) where they display a  
 19 variety of advertisements, including click-through links to live adult content. In Japan, Plaintiff’s adult  
 20 content is subject to stringent legal requirements, including adding “mosaics” (pixelated filters) to  
 21 certain content and also regulations that allow performers in adult video content to opt-out of  
 22 distribution of their content under certain conditions. Further, Plaintiff’s content is not currently  
 23 available in the United States via Internet streaming. These regulations increase the desirability of  
 24 Plaintiff’s content and value of content coming from its authorized brands. It also gives purchasers  
 25 assurance that the content is legal and is being created and distributed in accordance with Japanese law.  
 26



3.4. Defendants' actions are causing serious harm to Will Co. and its business, including in the United States and must be put to a stop immediately. Because Defendants will not do so voluntarily, Will Co. now comes before this Court seeking injunctive relief and substantial damages.

### **JURISDICTION AND VENUE**

4.5. This is a civil action seeking damages and injunctive relief for copyright~~trademark~~ infringement under 15 U.S.C. § 1051~~copyright~~ infringement under the Copyright Act, 17 U.S.C. § 101 *et seq.*

5.6. This Court has subject matter jurisdiction over Will Co.'s claims for copyright infringement ~~and violation~~, violations of the Digital Millennium Copyright Act and violations of the Lanham Act pursuant to 28 U.S.C. §§ 1331 and 1338.

6. ~~While based in Japan, Will Co. intentionally target the United States market for purposes of selling membership to Will Co. paid membership web sites, granting a paying user access to view Will Co.'s content or from DVD sales.~~

7. ~~Will Co.'s~~ The Ninth Circuit has already determined that Defendants are subject to personal jurisdiction in the United States for copyright infringement.

7. ~~Plaintiff's~~ Plaintiff's videos are viewed by a specific niche market in the United States, and it is a niche with high demand.

8. ~~Yearly, Will Co. earns in excess \$1M from U.S. Viewers based upon efforts to target its streaming videos to the United States market, DVDs are still sent to the United States, and Plaintiff has had years of prior use in the United States, resulting in millions of dollars of revenue and accumulated goodwill for its brands.~~

9. Plaintiff has over 50 copyright registrations in the United States and has considered the United States key to its long-term marketing, branding, and sales strategy.

9.10. To ~~protects~~protect its business and interest in the United States market, Will Co. filed for and obtained copyright registrations for ~~its~~certain content with the United States Copyright Office. It also owns dozens of Japan-registered trademarks for video services and video goods. Will Co.'s

1 brands also have significant value in the United States as sources for high-quality content that is  
 2 compliant with Japanese regulations.

3 ~~10-11.~~ Defendants Ka Yeung Lee, Youhaha Marketing and Promotion Limited, and Does 1-20  
 4 are currently unknown individual(s) and/or entity(ies) that own and operate ~~a website~~websites located  
 5 at the uniform resource locator (“URL”) https://ThisAV.com (“ThisAV Web Site”)-”) and the related  
 6 sites identified herein.

7 12. DefendantLong after this action was filed, Plaintiff became aware of other websites to  
 8 display the exact same content on the ThisAV Web Site. Most of these websites have identical HTML  
 9 “source” code for the sites, affiliate links, and service providers. These sites have proliferated so  
 10 quickly that Plaintiff is unable to keep track of all of them. However, some of these additional  
 11 infringing sites include: (i) Missav.com; (ii) misav789.com; (iii) MyAV.com; (iv) VassIm.com; and  
 12 others (“Defendants’ Websites”).

13 13. Defendants Does 1-20 act in concert with each other in the operation of ~~ThisAV Web~~  
 14 ~~Site~~a network of infringing websites.

15 14. Defendants knowingly and purposefully market to and target the entire United States,  
 16 including residents of this District, through ~~ThisAV Web Site~~Defendants’ Websites.

17 15. Based on a website analysis overview report prepared by Similarweb.com, an industry  
 18 trusted web site analytics company, dated July 2020 (the “SimilarWeb Report”), for the three-month  
 19 period ending June 30, 2020, ThisAV Web Site had 27.9 million visitors, with over a million in the  
 20 United States.

21 16. When this case began, the ThisAV Web Site ~~is was~~ hosted at GorillaServers, Inc. in the  
 22 United States. Defendants ~~utilize~~utilized a Content Delivery Network (“CDN”) with Cloudflare in the  
 23 United States. A CDN permits faster more efficient streaming of videos to a user far away from the  
 24 initial server. Thus, all videos viewed by United States viewers are delivered from a United States  
 25 server.

26 ~~11. —The domain name registrar is GoDaddy, LLC in Scottsdale, Arizona.~~

17. Based on a website analysis overview report prepared by Similarweb.com, an industry trusted web site analytics company, dated April 2024, for the three-month period ending March 2024, the MissAV.com Web Site alone had 611.5 million visitors.

18. Defendants' Websites utilize U.S.-based Akamai Technologies for content delivery services.

19. Defendants' Websites utilize California-based Cloudflare, Inc., a corporation incorporated under the laws of the State of Delaware for Registrar, DNS, and other services.

12. Defendants have attempted to hide their identity as the registrant of ~~the domain ThisAV.com~~ Defendants' Websites by redacting their identification on any public postings through ~~Arizona-based Domains By Proxy, LLC.~~

~~17.20.~~ Defendants utilize domain name privacy services provided by Cloudflare. The new sites ((i) Missav.com; (ii) misav789.com; (iii) MyAV.com; (iv) VassIm.com; (iv) FiveTiu.com; and (v) EightCha.com) are also hidden behind proxy servers ~~for ThisAV Web Site that are located in California and owned by Cloudflare, Inc., a corporation incorporated under the laws of the State of Delaware.~~

~~18.21.~~ ~~ThisAV Web Site displays~~ Defendants' Websites display geo-targeted advertisements to U.S. users, meaning the operators of the web site have means to determine the general locale of each user and displays advertisements consistent and/or specific to the U.S.

~~13.~~ Advertising links on ThisAV.com are displayed from Tiger Media, Inc., a service provider hosted in Dallas, Texas at StackPath, LLC. and Multi Media LLC based in California.

~~14.~~ Based on the SimilarWeb Report, for the three-month period ending June 30, 2020, Internet traffic driven to ThisAV Web Site from social media platforms came predominantly from Defendants' Websites utilize United States-based entities, such as Youtube, LLC, a California based company, which accounted for 77.21% of such traffic, Twitter, a California based company, which accounted for 7.34% of such traffic, Facebook LLC, a California based company, which accounted for 47.85% of such traffic.

1 ~~19.22. ThisAV Web Site uses United States based histats.com based Google Analytics~~, a  
2 website traffic tracking ~~tool software~~services of Google, LLC to track its website analytics.

3 ~~20.23. Defendants~~Defendants' use of U.S. vendors for domain name servers, privacy services,  
4 advertisers, geo-targeted ads and other services illustrate that Defendants are expressly aiming their  
5 web site and business at the United States Market.

6 ~~21.24. ThisAV Web Site~~Defendants' Websites, owned and/or operated by Defendants,  
7 expressly informed a user that may upload content to ThisAV that the user is expected to provide 2257  
8 records (referring to 18 U.S.C. § 2257) upon request. Defendants clearly intend and anticipate for U.S.  
9 viewers to use the ThisAV Web Site. In August 2022, after the 9<sup>th</sup> Circuit ruled on matters in this case  
10 (Case No. 21-35617) in favor of Plaintiff, the U.S.C. § 2257 information was quickly removed from  
11 Defendants' Websites.

12 ~~15. The Terms of Service and Privacy Policy on ThisAV Web Site are written in English~~  
13 ~~and contains language and concepts consistent with and specific to the United States legal system,~~  
14 ~~including warranties, disclaimers, and limits of liability, among other things. These documents are~~  
15 ~~clearly geared towards a United States audience.~~

16 ~~16. ThisAV Web Site contains a 2010 copyright notice at the bottom of each page, clearly~~  
17 ~~intended to be covered by U.S. Copyright laws.~~

18 25. Defendants in this matter previously brought a motion to dismiss based upon lack of  
19 personal jurisdiction. That motion was successful in the District Court but reversed by the Ninth Circuit  
20 in Will Co. v. Ka Yeung Lee, 47 F.4th 917, 919 (9th Cir. 2022). There is no question that personal  
21 jurisdiction is appropriate in this case.

22 13. Upon information and belief, Defendants all transact business in this Judicial District by  
23 way of their interactive website and through their interactivity with United States and Washington  
24 residents who have been offered the infringing and unlawful content at issue herein and who have,  
25 themselves, engaged in acts of infringement in this District and State. The Court has personal  
26 jurisdiction over the Defendants, who have engaged in business activities in and directed to this District

1 and have committed tortious acts within this District or directed at this District. The Defendants are  
 2 amenable to service of process pursuant to the state Long-Arm Statute, and Fed.R.Civ.P. 4(e).

3 14. Any alien defendant is subject to jurisdiction in any district. See 28 U.S.C. 1391 (“An  
 4 alien may be sued in any district.”) See also Fed. R. Civ. P. 4(k)(2).

5 15. This Court has subject matter jurisdiction over Plaintiff’s federal claims pursuant to 17  
 6 U.S.C. § 101 et seq., 28 U.S.C. §1331 and 28 U.S.C. §1338.

7 16. Venue is appropriate in this District pursuant to 28 U.S.C. § 1391(b) and/or (c).

8 17. This Court has personal jurisdiction pursuant to 28 U.S.C. §§ 1391(b), (c) and/or (d) and  
 9 28 U.S.C. § 1400(a).

### 10 **PARTIES**

11 ~~17.~~13. Will Co. is, and at all relevant times was, a private limited liability company organized  
 12 under the laws of Japan, and has its head office at Tokyo, Japan.

13 ~~18.~~14. Will Co., an award-winning Japanese entertainment company, is comprised of nearly  
 14 100 employees who manage over 37 registered trademarks and 50 brands, each of which explore and  
 15 deliver sensuality and sexuality through artistic photography, video, and erotic stories.

16 ~~19.~~15. Since 2016, Will Co. has grown its video library to over 50,000 full length adult  
 17 entertainment movies, featuring over 5000 models shot by over 300 photographer/directors. Its brands  
 18 have grown into a globally recognized leader of Japanese sensual art garnering numerous industry  
 19 awards through the use of studios in Japan, exotic locations, high budget productions, engaging  
 20 storylines, famed photographers and directors coupled with the dedication from its artists and  
 21 technicians.

22 ~~20.~~16. As Will Co. has expanded its library and expanded its reach to a United States audience,  
 23 Will Co. is registering copyrights with the U.S. Copyright Office.

24 ~~21.~~17. Will Co. has registered with the United States Copyright Office the copyrighted works  
 25 identified in this Complaint. Will Co. has taken industry standard steps to identify its products. Plaintiff  
 26

1 videos and photographs are watermarked with Plaintiff readily identifiable logos and other content  
2 management information.

3 22-18. A schedule of the Will Co. copyrighted works at issue in this case thus far, which have  
4 been registered with the U.S. Copyright Office, is attached hereto as Schedule A (the “Subject Works”).

5 19. Will Co. is also the owner of multiple trademark and service mark registrations in Japan,  
6 and it has built common law trademark and service mark rights in the United States (collectively, the  
7 registered and unregistered marks shall be referred to as the “Marks”) A schedule of the Marks is  
8 attached hereto as Exhibit B. Many of the Marks are registered with English language equivalents,  
9 e.g., MUTEKI, CROSS, E-BODY, FITCH, BEFREE, ROOKIE, kira☆kira and kuwaii\*.

10 23-20. Will Co. is the producer and exclusive licensor of its own motion pictures/content. Will  
11 Co. distributes its content through exclusive digital licensing with Digital Commerce Inc. ~~(Fanza) in~~  
12 ~~the USA. Fanza solely distributes Will Co.’s content on its paid membership websites for on-demand~~  
13 ~~viewing or DVD sales. Will Co. earns a revenue share from each transaction..~~ Digital Commerce, Inc.  
14 makes it products available through the website “Fanza.” Its goods are available in the United States.  
15 Its streaming service has temporarily halted in the United States, but it operated for years in the United  
16 States and was well-known within the relevant community, resulting in millions of dollars per month  
17 in revenues. Will Co. intends to begin its streaming service again in the United States. Will Co. also  
18 maintains separate websites available in the United States for its most popular brands, on such sites as:  
19 mutekimuteki.com.

20 24-21. Will Co. has never authorized or given consent to Defendants to use ~~their copyrighted~~  
21 ~~worksthe~~ Marks or Subject Works in the manner ~~displayed or exploited by Defendants and as~~  
22 ~~complained therein of herein.~~

23 25.—Defendants Defendants’ own and operate ~~ThisAV Web Site.~~

24 26-22. Defendants’ Websites. Defendant Ka Yeung Lee (hereinafter “Lee”) is, upon  
25 information and belief, a resident of the Hong Kong Special Administrative Region of the People’s  
26 Republic of China.

1 27-23. Defendant Lee is listed as the client and payor in client information maintained by  
 2 Gorilla Servers, Inc. for services provided to ThisAV Web Site. At the time of the initial filing, Gorilla  
 3 Services, Inc. iswas the hosting company for ThisAV Web Site.

4 28-24. Defendant Youhaha Marketing and Promotion Limited (hereinafter “Youhaha”) is, upon  
 5 information and belief a company formed and registered in the Hong Kong Special Administrative  
 6 Region of the People’s Republic of China.

7 29-25. Defendant Youhaha is listed as the client and payor in client information maintained by  
 8 Gorilla Servers, Inc. for services provided to ThisAV Web Site. Gorilla Services, Inc. iswas the  
 9 hosting company for ThisAV Web Site. Defendant Youhaha is also listed as the client and contact  
 10 information for Tiger Media, providing ad broker services for ThisAV Web Site.

11 26. On information and belief, Defendants also operate the mirror websites Missav.com; (ii)  
 12 misav789.com; (iii) MyAV.com; (iv) VassIm.com; (iv) FiveTiu.com; and (v) EightCha.com. On  
 13 information and belief, these are all the alter egos of Defendants Lee and Youhaha and the owners of  
 14 ThisAV.com. MissAV.com and the other mirror sites display the same content in the same format as  
 15 ThisAV.com and use the same source code.

16 30-27. Upon information and belief, ~~the ThisAV Web Site is based in the United~~  
 17 ~~States;~~Defendants’ Websites operate with full intention of broadcasting, distributing, or making  
 18 available content in the United States and earning money from the United States market. It appears  
 19 that the ~~ThisAV Web Site is hosted by a company~~Defendants’ Websites utilize U.S.-based in the  
 20 ~~United States with an IP address that points~~Cloudflare, Amakai Technologies, and other US services to  
 21 ~~a hosting facility in Ogden, Utah~~deliver infringing content to end users. It is currently unknown where  
 22 the owners and operators are located.

23 31-28. Defendants Does 12 through 20 are the owners, operators, shareholder executives, and  
 24 affiliates of ThisAV Web Site. Will Co. is unaware of the true names or capacities of Does 1 through  
 25 20. Will Co. is informed and believes, and on that basis alleges, that Does 1 through 20 either  
 26 (a) directly performed the acts alleged herein, (b) were acting as the agents, principals, alter egos,



employees, or representatives of the owners and operators of the web sites, and/or (c) otherwise participated in the acts alleged herein with the owners and operators of the web sites. Accordingly, Does 1 through 20 each are liable for all the acts alleged herein because they were the cause in fact and proximate cause of all injuries suffered by Will Co. as alleged herein. Will Co. will amend the complaint to state the true names of Does 1 through 20 when their identities are discovered.

29. Will Co.'s streaming video services are not currently available in the United States. However, Will Co.'s brands are well-known in the United States. In the world of adult entertainment, there is a strong demand for new content, which usually arises in the context of new streams. Will Co.'s brands release several new streaming videos each day. The longer the videos are available, the less valuable they become to a significant sector of Plaintiff's potential customers. The videos are also released on DVD or other digital formats after they are released in streaming.

#### **STATEMENT OF FACTS**

~~32. This AV Web Site is a pirate website, displaying copyrighted adult entertainment content without authorization or license.~~

30. In addition to the valuable copyright assets identified above, Will Co. owns dozens of trademarks and service marks in relation to provision of videos and video-related goods and services (the "Marks"). Many of the Marks are registered in Japan. A list of Will Co.'s more popular Marks is attached hereto as Exhibit B.

31. For instance, some of the Marks include:

(i) KIRA ☆KIRA: Reg. No. 5750634 in IC 009 and 041, respectively, for "Image files that can be received and stored using the Internet; Recorded video discs and video tapes" and "Planning or operation of a movie, entertainment, drama or music performance; Production of videotape/video disc masters; Planning, operation or holding of a sports performance."

2. Kawaii\*: Reg. No. 5750637 in IC 09 and 041 for "Image files that can be received and stored using the Internet • Recorded video discs and video tapes" and "Planning or operation of a film,



entertainment, drama or music performance; Production of videotape/video disc masters; Planning, operation or holding of a sports performance.”

3. MUTEKI: Reg. No. 5734687 in IC 041 for “Planning or operation of a movie, entertainment, drama or music performance; Production of videotape/video disc masters; Planning, operation or holding of a sports performance.”

32. Will’s Marks are associated with high quality, adult-themed goods and services based around its studios and specialty brands. There are very few authorized outlets for Will’s goods and services. By controlling access to a limited number of providers, Will maintains a tight rein on the quality and source of its goods and services, which have very few authorized providers.

33. Will’s Marks and brands are known around the world. As noted, a large percentage of the Internet traffic seeking of Defendants’ infringing materials derives from the United States. On information and belief, those potential consumers are familiar with Will’s brands and are confused as to the source of the materials on the Infringing Sites.

34. The Defendants’ Websites display the Marks with identical goods and services as those produced by Plaintiff

35. In order to gain access to the massive amounts of pirated content, a user simply need only click on the website. Internet users can simply watch videos on Defendants’ Websites for free without an account.

~~33.36.~~ In order to gain access to all of the highly interactive web site represented functions, users of ~~ThisAV Web Site~~ Defendants’ Websites must sign up for an account. ~~Internet users can simply watch videos on ThisAV Web Site for free without an account.~~

~~34.37.~~ The sign-up process for ThisAV Web Site requires entry of a username, password, and email address, ~~gender identity, age certification, agreement to Terms of Use and Privacy Policy.~~

~~35. — A user can manually sign up as a member to ThisAV Web Site.~~

1        ~~36. The entry of an email address during the sign-up process on ThisAV Web Site results~~  
 2 ~~in an email verification for the user. A user can access the additional site features such as upload~~  
 3 ~~capability once they have verified their email address.~~

4        ~~38. On~~ The process to view Defendants' Websites or secure an account does not require any  
 5 age verification.

6        ~~37.39.~~ Prior to the August 2022 changes to the websites, the ThisAV Web Site frequently asked  
 7 questions (FAQ) page, Defendants ~~state~~stated, "All newly uploaded videos need to be reviewed by the  
 8 webmaster." The webmaster, upon information and belief, is one of Defendants or an agent of  
 9 Defendants acting upon express authority and/or direction of Defendants.

10        ~~38.40.~~ Once a user has signed up, the user can, among other things, post videos or images for  
 11 display on ~~ThisAV Web Site~~the Defendants' Websites.

12        ~~39.41.~~ Videos on ~~ThisAV Web Site~~Defendants' Websites may be shared on other sites via  
 13 "embed links" that allow for posting on or to any social media site, website site, or via Email to anyone.  
 14 Such functionality makes it impossible to know how many times and where an unlicensed copyrighted  
 15 video has been posted and displayed illegally as a direct result of ~~Defendants~~Defendant unlawful  
 16 display.

17        ~~40.42.~~ Static banner advertisements exist on each page of ~~ThisAV Web Site~~Defendants'  
 18 Websites, including advertisements expressly directed at United States viewers on behalf of United  
 19 States companies.

20        ~~41.43.~~ When a user attempts to watch a video, the user will be shown ~~pop-up advertisement.~~  
 21 ~~A "pop-up" advertisement is just that, an ad that seemingly randomly appears on the user's~~  
 22 ~~screen.~~advertisements.

23        ~~42.44.~~ Pop-up and/or static bannerCertain advertisements on ~~ThisAV Web Site~~Defendants'  
 24 Websites are geo-targeted, meaning the operators of the ~~ThisAV Web Site~~Defendants' Websites have  
 25 means to determine the general locale of each user and ~~displays~~display advertisements consistent  
 26 and/or specific to the locale, including the United States.

1 ~~43.45.~~ Defendants earn money from the various advertisement schemes on ~~ThisAV Web Site.~~  
 2 ~~Defendants' Websites.~~ The amount of money ~~earn~~earned is directly related to the amount of traffic to  
 3 ~~ThisAV Web Site~~Defendants' Websites and the number of videos watched on the site. Therefore, the  
 4 quality of the videos on ~~ThisAV Web Site~~Defendants' Websites directly influences the revenue  
 5 generated by Defendants.

6 ~~46.~~ ~~ThisAV Web Site~~To further drive traffic to Defendants' Websites and exploit Plaintiffs  
 7 content, Defendants regularly post infringing content from Plaintiff to its @missav\_daily Twitter  
 8 Account (now X) daily.

9 ~~44.47.~~ ~~Defendants' Websites~~ fails to fulfill the requisite conditions precedent to qualify for the  
 10 safe harbor provisions of the DMCA. Specifically, ~~ThisAV Web Site does~~Defendants' Websites do not  
 11 have an appointed registered DMCA Agent. Further, Defendants fail to honor take-down notices sent  
 12 to ~~ThisAV Web Site~~Defendants' Websites and have failed to implement a reasonable repeat infringer  
 13 policy.

14 ~~45.48.~~ At the initial filing of this case, ThisAV Web Site ~~displays~~displayed a DMCA Notice  
 15 and a web page inclusive of industry-standard language with instructions for notifying ThisAV of  
 16 alleged copyright infringements. However, a copyright holder following such instructions ~~does~~did not  
 17 result in either removal of the infringing content nor a termination of an infringer if a repeat infringer.

18 ~~46.49.~~ Will Co.'s agents routinely police web sites to identify infringement of Will Co.'s  
 19 copyrighted works. In the course of doing so, Will Co.'s agents discovered many of Will Co.'s  
 20 copyrighted works have been made available, in full, to the public on the ~~ThisAV Web Site~~Defendants'  
 21 Websites for free and without license or authorization from Will Co.

22 ~~47.50.~~ Specifically, ~~between June 2020 and July 2020~~ it was discovered that ~~ThisAV Web~~  
 23 ~~Site~~Defendants' Websites displayed ~~1350~~ of Plaintiff's copyright registered ~~works over 19 separate and~~  
 24 ~~distinct URLs on~~ each ~~a part~~ of ~~ThisAV Web Site.~~Defendants' Websites identified herein. These  
 25 copyright registered works are listed in Exhibits A ~~with ThisAV.com infringing URLs in Exhibit B,~~  
 26 attached hereto. Defendants have no authority or license to display or distribute any portion of

1 Plaintiffs' copyrighted works in the manner displayed or exploited by Defendants and as complained  
2 therein.

3 51. To date, Plaintiff has identified 1,738,686 Links to infringing use of 50,120 full length  
4 video titles on MissAV.com and ThisAV.com alone.

5 52. Plaintiff has identified and documented the infringing use of its copyright registered  
6 works on each of Defendants' Websites identified in this complaint.

7 ~~48.53.~~ Will Co. sent DMCA compliant takedown notices to ~~ThisAV Web Site~~ Defendants'  
8 Websites pursuant to 17 U.S.C. § 512(c) and the policy stated on ThisAV Web Site and to its service  
9 providers pursuant to their published policies.

10 ~~49.54. Receipt of the takedown notices was acknowledged through ThisAV Web Site.~~  
11 ~~However, none of Will Co.'s~~ None of Plaintiff's content was removed.

12 50. Defendants do not have a stated repeat infringer policy ~~and none of the users were~~  
13 ~~terminated by Defendants.~~

14 51. Upon information and belief, Defendants have actual knowledge and clear notice of  
15 the infringement of Plaintiff's titles. Upon information and belief, Defendants are placing and making  
16 available for display Plaintiffs content and the associated data including the name of the actors,  
17 trademark brand, and owner information on the Defendants' Websites. The infringement is clear and  
18 obvious even to the most naïve observer. Plaintiff's copyrighted works are indexed, displayed, and  
19 distributed on ~~ThisAV Web Site~~ Defendants' Websites through Defendants and the Doe Defendants  
20 acting in concert. Plaintiff's and other major producers' trademarks and DVD catalog number are used  
21 to index infringing material and other identifiers which is evidence of knowledge and intent.

22 ~~52.55.~~ By virtue of the conduct alleged herein, Defendants knowingly promote, participate  
23 in, facilitate, assist, enable, materially contribute to, encourage, and induce copyright infringement, and  
24 thereby have infringed, secondarily infringed, and induced infringement by others, the copyrights in  
25 Plaintiffs' copyrighted work.

53. Defendants manually review each video ~~prior to~~before that video being made available to the public ~~on ThisAV.com.~~

54.56. Defendants, either jointly, severally, actually, constructively, and with or without direct concert with one another, deprived Plaintiffs of the lawful monetary rewards that accompany its rights in the copyrighted works. ~~Defendants disregard for copyright trademark laws threaten Plaintiff's business and Marks.~~

55.57. Defendants' disregard for copyright and trademark laws threaten Plaintiff's business. Defendants intentionally, knowingly, negligently, or through willful blindness avoided reasonable precautions to deter the rampant copyright infringement, unfair competition and trademark infringement on their website.

56.58. Defendants' acts and omissions allow them to profit from their infringement while imposing the burden of monitoring Defendants' website onto copyright holders, without sufficient means to prevent continued and unabated infringement.

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**FIRST CAUSE OF ACTION CLAIM FOR RELIEF**  
**Copyright Infringement – 17 U.S.C. §§ 101 et. seq.**  
**Against All Defendants**

57.59. Will Co. repeats, re-alleges, and incorporates by reference each preceding allegation set forth herein.

58.60. Will Co. is the owner of valid and registered copyrights in the Subject Works.

59.61. Will Co. registered each copyright with the United States Copyright Office.

60.62. Defendants have infringed, and are continuing to infringe, Will Co.'s copyrights by reproducing, adapting, distributing, publicly performing, and/or publicly displaying and authorizing others to reproduce, adapt, distribute, publicly perform, and/or publicly display copyrighted portions

1 and elements of the Subject Works, and/or the Subject Works in their entirety, without authorization,  
 2 in violation of the Copyright Act, 17 U.S.C. § 101 *et seq.*

3 ~~61-63.~~ Defendants did not have authority or license to copy and/or display the Subject Works.

4 ~~62-64.~~ Will Co. has never authorized or given consent to Defendants to use the Subject Works  
 5 in the manner displayed and exploited by Defendants.

6 ~~63-65.~~ Defendants knew or reasonably should have known they did not have permission to  
 7 exploit the Subject Works on the ~~ThisAV-Web-Site~~Defendants' Websites and further knew or should  
 8 have known their acts constituted copyright infringement.

9 ~~64-66.~~ Defendants' acts of infringement are willful, in disregard of, and with indifference to  
 10 the manner displayed and exploited by Defendants.

11 ~~65-67.~~ Defendants engaged in intentional, knowing, negligent, or willfully blind conduct  
 12 sufficient to demonstrate they engaged actively in the improper collection and distribution of Plaintiffs'  
 13 copyrighted works.

14 ~~66-68.~~ The quantity and quality of copyright files available to users increased the attractiveness  
 15 of Defendants' service to its customers, increased its users base, and increased its ad sales revenue.

16 ~~67-69.~~ Based on information and belief, Defendants actively uploaded pirated copyrighted  
 17 files ~~and/or embedded code~~, enabling users of ~~ThisAV-Web-Site~~Defendants' Websites to view  
 18 copyrighted videos and images for free.

19 ~~68-70.~~ Defendants controlled the files owned by Will Co. and determined which files  
 20 remained for display and distribution.

21 ~~69-71.~~ Defendants never implemented or enforced a "repeat infringer" policy.

22 ~~70-72.~~ Defendants either were aware, actually or constructively, should have been aware, or  
 23 were willfully blind that pirated copyrighted materials comprised the most popular videos on the  
 24 Defendants websites.

25 ~~71-73.~~ Defendants, through ~~ThisAV-Web-Site~~Defendants' Websites, affirmatively and  
 26 willfully accommodated Internet traffic generated by the illegal acts.

1 72.74. Defendants' conduct was willful within the meaning of 17 U.S.C. § 101, *et seq.* At a  
 2 minimum, Defendants acted with willful blindness and reckless disregard of Will Co.'s registered  
 3 copyrights.

4 73.75. Because of their wrongful conduct, Defendants are liable to Will Co. for copyright  
 5 infringement. See 17 U.S.C. §501. Plaintiff suffers and will continue to suffer substantial losses,  
 6 including, but not limited to, damage to its business reputation and goodwill.

7 74.76. The law permits Plaintiff to recover damages, including readily ascertainable direct  
 8 losses and all profits Defendants made by their wrongful conduct. 17 U.S.C. §504. Alternatively,  
 9 the law permits Plaintiff to recover statutory damages. 17 U.S.C. §504(c).

10 75.77. Because of Defendants' willful infringement, the law permits enhancement of the  
 11 allowable statutory damages. 17 U.S.C. §504(c) (2).

12 76.78. The law permits Plaintiff injunctive relief. 17 U.S.C. §502. Further, the law permits  
 13 a Court Order impounding all infringing materials. 17 U.S.C. §503.

14 77.79. Because of Defendants' acts and conduct, Will Co. has sustained and will continued  
 15 to sustain substantial, immediate, and irreparable injury, for which there is not adequate remedy  
 16 at law. Unless enjoined and restrained by the Court, Defendants will continue to infringe Will  
 17 Co.'s rights in the Subject Works. Will Co. is entitled to temporary, preliminary, and permanent  
 18 injunctive relief to restrain and enjoin Defendants' continuing infringing conduct.

## 20 **SECOND CAUSE OF ACTION CLAIM FOR RELIEF**

### 21 **Inducement of Copyright Infringement**

#### 22 **Against All Defendants**

23 78.80. Will Co. repeats, re-alleges, and incorporates by reference each preceding allegation set  
 24 forth herein.

25 79.81. Defendants designed and/or distributed technology and/or devices and/or  
 26 induced individuals to use this technology to promote the use of infringed and copyrighted material.



1 As a direct and proximate result of Defendants' inducement, individuals infringed Will Co.'s  
 2 copyrighted works. These individuals reproduced, distributed and publicly disseminated Will Co.'s  
 3 copyrighted works through Defendants' website.

4 ~~80.82.~~ On information and belief, Defendants have encouraged the illegal uploading and  
 5 downloading of Will Co.'s copyrighted works, thus inducing the unauthorized reproduction,  
 6 adaptation, public display and/or distribution of copies of the Will Co.'s copyrighted works, and thus  
 7 to the direct infringement of Will Co.'s copyrighted works.

8 ~~81.83.~~ Defendants' actions constitute inducing copyright infringement of Will Co.'s copyrights  
 9 and exclusive rights under copyright in the Will Co.'s copyrighted works in violation of the Copyright  
 10 Act, 17 U.S.C. §§ 106 and 501.

11 ~~82.84.~~ The infringement of Will Co.'s rights in and to each of the Will Co.'s copyrighted works  
 12 constituted a separate and distinct infringement.

13 ~~83.85.~~ The acts of infringement by Defendants have been willful, intentional, purposeful and  
 14 in reckless disregard of and with indifference to Will Co.'s rights.

15 ~~84.86.~~ As a direct and proximate result of the infringements by Defendants of Will Co.'s  
 16 copyrights and exclusive rights under copyright in the Will Co.'s copyrighted works, Will Co. is  
 17 entitled to its actual damages and Defendants' profits pursuant to 17 U.S.C. § 504(b).

18 ~~85.87.~~ Alternatively, Will Co. is entitled to maximum statutory damages, pursuant to 17 U.S.C.  
 19 § 504(c), in the amount of \$150,000 with respect to each work infringed, or such other amounts as may  
 20 be proper under 17 U.S.C. § 504(c).

21 ~~86.88.~~ Will Co. is further entitled to their attorneys' fees and full costs pursuant to 17 U.S.C. §  
 22 505.

23 ~~87.89.~~ Because of Defendants' acts and conduct, Will Co. has sustained and will continue  
 24 to sustain substantial, immediate, and irreparable injury, for which there is no adequate remedy at  
 25 law. Unless enjoined and restrained by the Court, Defendants will continue to infringe Will Co.'s  
 26



rights in the Subject Works. Will Co. is entitled to temporary, preliminary, and permanent injunctive relief to restrain and enjoin Defendants' continuing infringing conduct.

**THIRD CLAIM FOR RELIEF**  
**Vicarious and Contributory Inducement of Copyright Infringement**  
**Against All Defendants**

90. Plaintiff repeats, re-alleges, and incorporates by reference as though fully set forth herein, the allegations contained in the preceding paragraphs of this Complaint.

91. Defendants have systematically failed to take any action to remove infringing content from the Infringing Sites.

92. Plaintiff is informed and believes and thereon alleges that Defendants, and each of them, knowingly induced, participated in, aided and abetted, and resultantly profited from the illegal reproduction, distribution, display, and/or creation of derivative works based on the Subject Works as alleged herein.

93. Plaintiff is informed and believes and thereon alleges that Defendants, and each of them, are vicariously liable for the infringement alleged herein because they had the right and ability to supervise the infringing conduct and because they had a direct financial interest in the infringing conduct.

94. Plaintiff is informed and believes and on that basis alleges that Defendants, and each of them, are contributory infringers because each knew or had reason to know of the infringing activity and that Defendants intentionally and materially contributed to the infringing activity.

95. By reason of the Defendants', and each of their, acts of contributory and/or vicarious infringement as alleged above, Plaintiff has suffered and will continue to suffer substantial damages to its business in an amount to be established at trial.

96. By reason of the Defendants' and each of their acts of contributory and/or vicarious infringement as alleged above, Plaintiff has suffered and will continue to suffer general and special damages to its business in an amount to be established at trial.

97. Due to Defendants' acts of contributory and/or vicarious copyright infringement, Defendants, and each of them, have obtained direct and indirect profits they would otherwise not have realized but for their infringement of the Subject Works. As such, Plaintiff is entitled to disgorgement of Defendants' profits, directly and indirectly, attributable to Defendants' infringement of the Subject Works in an amount to be established at trial.

98. Plaintiff is informed and believes and thereupon alleges that Defendants, and each of them, have continued to infringe Plaintiff's copyright rights. Therefore, Defendants' acts of copyright infringement as alleged above were, and continue to be, willful, intentional, and malicious, subjecting Defendants, and each of them, to liability, therefore. Further, Defendants, and each of them, willfully and intentionally misappropriated, palmed-off, and/or infringed Plaintiff's Subject Works which renders Defendants, and each of them, liable for damages as described herein.

#### FOURTH CLAIM FOR RELIEF

**(Trademark Infringement, False Designation of Origin and Unfair Competition -- Against All Defendants)**

99. Plaintiff realleges and incorporates in this cause of action all previous paragraphs of  
this complaint.

100. This claim for relief arises under 15 U.S.C. § 1125(a)(1)(A) and is alleged against all Defendants.

101. Plaintiff is the owner of the Marks and is entitled to sole use of those Marks in relation  
to the business, goodwill and services associated with the Marks.

102. None of the Defendants named herein have any claim or colorable right to utilize the  
name Marks either in connection with goods or services related vidoes.

1        103. Plaintiff's Marks function as designations origin that identify Plaintiff as the exclusive  
2 source of adult-themed videos and video-related services, and distinguish Plaintiff's goods from the  
3 goods of others in the marketplace.

4        104. Defendants' use of Plaintiff's Marks in connection with its goods constitutes false  
5 designation or origin and/or false or misleading representation. Defendants' use of identical or  
6 confusingly similar variations of Plaintiff's Marks is likely to cause confusion, or mistake, or to  
7 deceive others into believing that Defendants' products are manufactured, offered, sponsored,  
8 authorized, licensed, of similar quality to, or otherwise connected or affiliated with Plaintiff and  
9 Plaintiff's goods and services.

10       105. Such false designation of origin and or representation constitutes unfair  
11 competition and is an infringement of Plaintiff's rights in its Marks in violation of § 43(a) of the  
12 Lanham Act, 15 U.S.C. § 1125(a).

13       106. On information and belief, Defendants' acts are deliberate and intended to confuse the  
14 public as to the source of the Defendants' goods and services, to injure Plaintiff, and to reap the  
15 benefits of Plaintiff's goodwill associated with Plaintiffs' Marks.

16       107. As a direct and proximate result of Defendants' willful and unlawful conduct,  
17 Defendant has damaged and will continue to damage Plaintiff's business, market, reputation, and  
18 goodwill, and may discourage current and potential customers from dealing with Plaintiff. Such  
19 irreparable damage will continue unless Defendant is enjoined from infringing Plaintiff's Marks.

20       108. In light of the foregoing, Plaintiff is entitled to injunctive relief prohibiting Defendants  
21 from using Plaintiff's Marks or any confusingly similar Marks for any purpose, and to recover from  
22 Defendant all damages that Plaintiff has sustained and will sustain as a result of such infringing acts,  
23 and all gains, profits and advantages obtained by Plaintiff as a result thereof, in an amount not yet  
24 known well, as well as the costs of this action pursuant to 15 U.S.C. § 1117(a) and attorneys' fees and  
25 treble damages pursuant to 15 U.S.C. § 1117(b).

109. Pursuant to 15 U.S.C. § 1118, Plaintiff also asks the Court for an order forcing Defendant to deliver up for destruction all products, labels, signs, prints, advertisements, and other articles in Defendants' possession that infringe upon Plaintiff's rights.

110. Defendants' acts have damaged and will continue to damage Plaintiff, and Plaintiff has no adequate remedy at law.

111. Defendants are using Plaintiff's Marks so as to cause confusion as to Plaintiff's association with, affiliation with, or sponsorship of Plaintiff's goods and services.

112. Plaintiffs are informed and believe that the acts of Defendants complained of herein were undertaken willfully and with the intention of causing confusion, mistake or deception.

113. Monetary relief alone is not adequate to address fully the irreparable injury that defendants' illegal actions have caused and will continue to cause Plaintiff if Defendants' actions are not enjoined. Plaintiff will therefore also be entitled to preliminary and permanent injunctive relief to stop the ongoing acts of unfair competition and other violations by Defendant and anyone acting in concert with it.

## FIFTH CLAIM FOR RELIEF

**(Dilution – Against all Defendants)**

114. Plaintiff realleges and incorporates in this cause of action all previous paragraphs of this Complaint.

115. This claim for relief arises under section 43(c) of the Lanham Act, 15 U.S.C. § 1125(c)  
and is alleged against all defendants.

116. Plaintiff is the owner of the valuable, famous Marks associated with provision of video-related goods and services, and is entitled to sole use and ownership of the business, goodwill of those Marks.

117. Plaintiff's Marks have become famous throughout the United States, through use in the in connection with its high quality, regulation-compliant videos. Accordingly, it is entitled to protection under § 1125(c).

1 118. Defendants' unauthorized use of Plaintiff's trade names and Marks does and will  
2 dilute the distinctive quality of the trade name and marks and will diminish and destroy the public  
3 association of the trade name and Marks with Plaintiff.

4 119. In engaging in the actions complained of above, Defendants and each of them willfully  
5 intended and intend to trade on the reputation of Plaintiff's Marks.

6 120. In engaging in the actions complained of above, Defendants and each of them have  
7 willfully intended to cause dilution of the famous trade names and marks belonging to Plaintiff.  
8 For each act violating Plaintiff's rights, Plaintiff is entitled to recover actual damages as well as  
9 Defendants' profits from such infringement.

10 121. Plaintiff is informed and believes that the acts of Defendants complained of herein  
11 were undertaken willfully and intentionally by Defendants.

12 122. Monetary relief alone is not adequate to address fully the irreparable injury that  
13 Defendants' illegal actions have caused and will continue to cause Plaintiff if Defendants' acts are not  
14 enjoined. Plaintiff is therefore also entitled to preliminary and permanent injunctive relief to stop  
15 Defendants' ongoing violations as well as those of anyone acting in concert with them.

16 **SIXTH CLAIM FOR RELIEF**

17 **(Washington Common Law Trademark Infringement)**

18 123. Plaintiff realleges and incorporates by this reference each and every allegation set forth  
19 in the paragraphs.

20 124. Defendants' use of Plaintiff's Marks has infringed on its distinctive features in a  
21 manner that tends to confuse, in the public mind, Plaintiff's products with others.

22 125. Defendants' acts, as above alleged, constitute infringement of Plaintiff's Marks in  
23 violation of the common law.

24 126. Plaintiff has been and continues to be damaged in a manner that cannot be fully  
25 measured or compensated in economic terms and for which there is no adequate remedy at law. The  
26

1 actions of Defendant has damaged and will continue to damage Plaintiff's market, reputation, and  
2 goodwill.

3 127. Plaintiff has been damaged by Defendants' actions in an amount to be proven at trial.

4 **SEVENTH CLAIM FOR RELIEF**

5 **(Unfair Business Practices — RCW 19.86 et seq.)**

6 128. Plaintiff realleges and incorporates by this reference each and every allegation set forth  
7 in paragraphs above.

8 129. Defendants' use of Plaintiff's Marks to promote, market, or sell products in  
9 Washington constitutes an unfair business practice pursuant to RCW 19.86 et seq.

10 130. Defendants' use of Plaintiff's Marks is an unfair or deceptive practice occurring in  
11 trade or commerce that impacts the public interest and has caused injury to Plaintiff.

12 131. Defendants' actions violate RCW 19.86 et seq.

13 **EIGHTH CLAIM FOR RELIEF**

14 **(Washington Common Law Unfair Competition)**

15 132. Plaintiff realleges and incorporates by this reference each and every allegation set  
16 forth in the paragraphs above.

17 44. Defendants' use of Plaintiff's Marks has used the Marks in a manner that tends to confuse,  
18 in the public mind, Plaintiff's products and/or advertising with the products and/or advertising of  
19 others.

20 45. The acts of Defendant complained of herein constitute unfair competition in  
21 violation of Washington common law.

22  
23  
24 **PRAYER FOR RELIEF**

25 WHEREFORE, Plaintiff Will Co. Ltd prays that this Court enter judgment in its favor on each  
26 and every claim for relief set forth above and award Will Co. relief including, but not limited to, an  
Order:

1           A.     Preliminarily and permanently enjoining Defendants, their agents, servants, officers,  
 2 directors, employees, attorneys, privies, representatives, successors and assigns and parent and  
 3 subsidiary corporations or other related entities, and any or all persons acting in concert or participation  
 4 with any of them, or under their direction or control, from any of the following activities:

5           (1)     Hosting, linking to, distributing, reproducing, copying, downloading, uploading,  
 6 making available for download, indexing, displaying, exhibiting, publicly performing,  
 7 communicating to the public, streaming, transmitting, or otherwise exploiting or making  
 8 any use of any of Will Co.'s copyrighted works, including the Subject Works, or any  
 9 portion(s) thereof in any form;

10          (2)     Enabling, facilitating, permitting, assisting, soliciting, encouraging or inducing,  
 11 whether directly or indirectly, any user or other third party (i) to host, link to, distribute,  
 12 reproduce, copy, download, upload, make available for download, index, display,  
 13 exhibit, publicly perform, communicate to the public, stream, transmit, or otherwise  
 14 exploit or make any use of Will Co.'s copyrighted works, including the Subject Works,  
 15 or portion(s) thereof; or (ii) to make available any of Will Co.'s copyrighted works,  
 16 including the Subject Works, for hosting, linking to, distributing, reproducing, copying,  
 17 downloading, uploading, making available for download, indexing, displaying,  
 18 exhibiting, publicly performing, communicating to the public, streaming, transmitting,  
 19 or other exploitation or use;

20          (3)     Using, operating, maintaining, distributing, or supporting any computer server,  
 21 website, software, domain name, email address, social media account, bank account, or  
 22 payment processing system in connection with the hosting, linking to, distributing,  
 23 reproducing, copying, downloading, uploading, making available for download,  
 24 indexing, displaying, exhibiting, publicly performing, communicating to the public,  
 25 streaming, transmitting, or other exploitation or use of any of Will Co.'s copyrighted  
 26 works, including the Subject Works;

(4) Enabling, facilitating, permitting, assisting, soliciting, encouraging or inducing, whether directly or indirectly, any user or other third party to visit any website, including but not limited to any website operated by Defendants, that hosts, links to, distributes, reproduces, copies, downloads, uploads, makes available for download, indexes, displays, exhibits, publicly performs, communicates to the public, streams, transmits, or otherwise exploits or makes any use of Will Co.'s copyrighted works, including the Subject Works, or portion(s) thereof;

(5) Transferring or performing any function that results in the transfer of the registration of the domain name of ~~ThisAV-Website~~Defendants' Websites including MissAV.com, ThisAV.com, MyAV.com, MissAV789.com, to any other registrant or registrar; and

(6) Assisting, aiding or abetting any other person or business entity in engaging in or performing any of the activities referred to in this Paragraph.

B. Requiring Defendants and their officers, servants, employees, agents and any persons who are, or on notice and upon continued provision of services would be, in active concert or participation with them, including but not limited to the domain name registrars and registries administering, holding, listing, or otherwise having control over the ~~domain—name~~ ThisAV.comDefendants' Websites or any other domain name used in conjunction with ~~Defendant's~~Defendants' infringing activities, to transfer such domain name to Will Co.'s ownership and control, including, *inter alia*, by changing the registrar of record to the registrar of Will Co.'s choosing, unless Will Co. requests that such domain name be held and/or released rather than transferred.

C. Requiring Defendants, their agents, servants, officers, directors, employees, attorneys, privies, representatives, successors and assigns and parent and subsidiary corporations or other related entities, and any or all persons or entity acting in concert or participation with any of them, or under their direction or control, including any internet search engines, web hosting and Internet service



providers, domain name registrars, domain name registries and other service or software providers, within five (5) business days from the issuance of this Order:

(1) To block or attempt to block access by United States users of ~~ThisAV-Web Site~~ Defendants' Websites including MissAV.com, ThisAV.com, MyAV.com, MissAV789.com, by blocking or attempting to block access to all domains, subdomains, URLs, and/or IP Addresses that has as its sole or predominant purpose to enable to facilitate access to ~~ThisAV-Web Site~~ Defendants' Websites including MissAV.com, ThisAV.com, MyAV.com, MissAV789.com,;

(2) To re-route all domains, subdomains, URLs, and/or IP Addresses that provides access to each and every URL available from each of ~~ThisAV-Web Site~~ Defendants' Websites and its domains and subdomains.

ÐD. That the Court issue preliminary and permanent injunctive relief against Defendant, and that Defendant, its officers, agents, representatives, servants, employees, attorneys, successors and assignees, and all others in active concert or participation with Defendant, be enjoined and restrained from offering for sale, marketing, or selling any product which uses the Marks or any confusing similar designation;

E. That the Court find Defendant's acts complained of herein unlawful as constituting unfair competition, false designation of origin, trademark and service mark infringement, and unjust enrichment under the causes of action asserted in this Second Amended Complaint;

F. That the Court require that Defendant deliver up for destruction all products, labels, signs, prints, advertisements, and other articles that infringe Plaintiff's Marks, or are a result of any false designation of origin or unfair competition by Defendant;

G. That the Court order an accounting of all gains, profits and advantages derived from Defendant's wrongful acts;

H. That Defendants be ordered to file with the Court and serve upon Plaintiff, within thirty (30) after the entry of an injunction, a report in writing and under oath, setting forth in detail the manner and form in which Defendants have complied with any ordered injunction;

I. That Plaintiff be awarded statutory damages in an amount to be determined at trial for all infringing activities, or actual damages including Plaintiff's damages and lost profits, Defendants' profit;

J. That Defendants be ordered to account to Plaintiff for all profits, gains and advantages that they have realized as a consequence of their unauthorized use of Plaintiff's copyrighted works;

K. That Plaintiff be awarded enhanced damages and attorney's fees;

L. That Plaintiff be awarded pre-judgment and post-judgment interest;

M. That Plaintiff be awarded costs and expenses incurred in prosecuting this action, including expert witness fees; and

— and

N. That such other and further preliminary and permanent relief be awarded to Plaintiff as the Court deems appropriate.

### **DEMAND FOR JURY TRIAL**

Plaintiff hereby respectfully demands a jury trial as provided by Rule 38(a) of the Federal Rules of Civil Procedure.

DATED: ~~December 10, 2020~~ April 22, 2024

**FREEMAN LAW FIRM, INC.**

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13 (Moving for Admission pro hac vice)  
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# **EXHIBIT B**

## **Proposed Second Amended** **Complaint Clean**

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8 **UNITED STATES DISTRICT COURT**  
9 **WESTERN DISTRICT OF WASHINGTON**  
10 **TACOMA DIVISION**

11 WILL CO. LTD. a limited liability company  
12 organized under the laws of Japan,

13 Plaintiff,

14 vs.

15 KA YEUNG LEE, an individual; YOUHAHA  
16 MARKETING AND PROMOTION  
17 LIMITED, a foreign company; and DOES 1-5  
18 d/b/a THISAV.COM, MISSAV.COM,  
19 MYAV.COM, MISSAV789.com,  
20 VASSIM.COM, and John Does 6-20

21 Defendants.

**Case No.: 3:20-cv-05802-BHS**

**SECOND AMENDED COMPLAINT  
FOR DAMAGES AND INJUNCTIVE  
RELIEF**

**DEMAND FOR JURY TRIAL**

22 Plaintiff Will Co. Ltd. (hereinafter referred to as “Plaintiff” or “Will Co.”) by and through its  
23 counsel of record files this Complaint against Defendants Ka Yeung Lee, Youhaha Marketing and  
24 Promotion Limited, Doe 1, d/b/a THISAV.COM, MISSAV.COM, MYAV.COM, MISSAV789.com,  
25 VASSIM.COM, and John Does 2-20 (collectively hereinafter referred to as “Defendant” or  
26 “Defendants”).

**PRELIMINARY STATEMENT**

1. Will Co. is an award-winning Japan based entertainment company which includes a vast  
library of full-length adult entertainment movies offered for viewing in a fee-based model. Will Co.

1 sells access to its content and has filed for and obtained copyright registrations with the U.S. Copyright  
2 Office. It also owns dozens of trademarks and service marks registered in Japan. Will Co. produces  
3 content that is available through dozens of well-known brands. Through these brands, the content is  
4 purchased through a single exclusive licensing agreement with Japan-based DMM via its online sales  
5 portal and through DVD sales. By this lawsuit, Will Co. seeks to protect its copyrighted audiovisual  
6 works and trademark-related rights from blatant infringement by Defendants in the United States.

7 2. The conduct that gives rise to this lawsuit is egregious and willful. Defendants own and  
8 operate websites engaged in the business of copying and distributing infringing audiovisual works.  
9 Defendants are directly and knowingly involved in the trafficking of thousands of pirated works –  
10 including many works owned by Will Co. Moreover, though Defendants are not “service providers,”  
11 not engaged in the storage of content at the direction of users, and thus not entitled to any of the safe  
12 harbors afforded under Section 512 of the Digital Millennium Copyright Act (“DMCA”) (17 U.S.C. §  
13 512), Defendants do not comply with their obligations under the DMCA. Plaintiff has sent takedown  
14 notices in attempts to remove over 1.5M links to infringing use of its works. Defendants systematically  
15 refuse to comply with proper and compliant DMCA takedown notices.

16 3. Defendants earn income through driving traffic to their website(s) where they display a  
17 variety of advertisements, including click-through links to live adult content. In Japan, Plaintiff’s adult  
18 content is subject to stringent legal requirements, including adding “mosaics” (pixelated filters) to  
19 certain content and also regulations that allow performers in adult video content to opt-out of  
20 distribution of their content under certain conditions. Further, Plaintiff’s content is not currently  
21 available in the United States via Internet streaming. These regulations increase the desirability of  
22 Plaintiff’s content and value of content coming from its authorized brands. It also gives purchasers  
23 assurance that the content is legal and is being created and distributed in accordance with Japanese law.

24 4. Defendants’ actions are causing serious harm to Will Co. and its business, including in  
25 the United States and must be put to a stop immediately. Because Defendants will not do so voluntarily,  
26 Will Co. now comes before this Court seeking injunctive relief and damages.

**JURISDICTION AND VENUE**

5. This is a civil action seeking damages and injunctive relief for trademark infringement under 15 U.S.C. § 1051 copyright infringement under the Copyright Act, 17 U.S.C. § 101 *et seq.*,

6. This Court has subject matter jurisdiction over Will Co.'s claims for copyright infringement, violations of the Digital Millennium Copyright Act and violations of the Lanham Act pursuant to 28 U.S.C. §§ 1331 and 1338.

7. The Ninth Circuit has already determined that Defendants are subject to personal jurisdiction in the United States for copyright infringement.

8. Plaintiff's videos are viewed by a specific niche market in the United States, and it is a niche with high demand. While Plaintiff recently has been limiting the availability of its streaming videos to the United States, DVDs are still sent to the United States, and Plaintiff has had years of prior use in the United States, resulting in millions of dollars of revenue and accumulated goodwill for its brands.

9. Plaintiff has over 50 copyright registrations in the United States and has considered the United States key to its long-term marketing, branding, and sales strategy.

10. To protect its business and interest in the United States market, Will Co. filed for and obtained copyright registrations for certain content with the United States Copyright Office. It also owns dozens of Japan-registered trademarks for video services and video goods. Will Co.'s brands also have significant value in the United States as sources for high-quality content that is compliant with Japanese regulations.

11. Defendants Ka Yeung Lee, Youhaha Marketing and Promotion Limited, and Does 1-20 are currently unknown individual(s) and/or entity(ies) that own and operate websites located at the uniform resource locator ("URL") <https://ThisAV.com> ("ThisAV Web Site") and the related sites identified herein.

12. Long after this action was filed, Plaintiff became aware of other websites to display the exact same content on the ThisAV Web Site. Most of these websites have identical HTML "source"

code for the sites, affiliate links, and service providers. These sites have proliferated so quickly that Plaintiff is unable to keep track of all of them. However, some of these additional infringing sites include: (i) Missav.com; (ii) [misav789.com](http://misav789.com); (iii) MyAV.com; (iv) VassIm.com; and others (“Defendants’ Websites”).

13. Defendants Does 1-20 act in concert with each other in the operation of a network of infringing websites.

14. Defendants knowingly and purposefully market to and target the entire United States, including residents of this District, through Defendants’ Websites.

15. Based on a website analysis overview report prepared by Similarweb.com, an industry trusted web site analytics company, dated July 2020 (the “SimilarWeb Report”), for the three-month period ending June 30, 2020, ThisAV Web Site had 27.9 million visitors, with over a million in the United States.

16. When this case began, the ThisAV Web Site was hosted at GorillaServers, Inc. in the United States. Defendants utilized a Content Delivery Network (“CDN”) with Cloudflare in the United States. A CDN permits faster more efficient streaming of videos to a user far away from the initial server. Thus, all videos viewed by United States viewers are delivered from a United States server.

17. Based on a website analysis overview report prepared by Similarweb.com, an industry trusted web site analytics company, dated April 2024, for the three-month period ending March 2024, the MissAV.com Web Site alone had 611.5 million visitors.

18. Defendants’ Websites utilize U.S.-based Akamai Technologies for content delivery services.

19. Defendants’ Websites utilize California-based Cloudflare, Inc., a corporation incorporated under the laws of the State of Delaware for Registrar, DNS, and other services.

20. Defendants have attempted to hide their identity as the registrant of Defendants’ Websites by redacting their identification on any public postings through privacy services provided by



1 Cloudflare. The new sites ((i) Missav.com; (ii) [misav789.com](https://misav789.com); (iii) MyAV.com; (iv) VassIm.com; (iv)  
2 FiveTiu.com; and (v) EightCha.com) are also hidden behind proxy servers.

3 21. Defendants' Websites display geo-targeted advertisements to U.S. users, meaning the  
4 operators of the web site have means to determine the general locale of each user and displays  
5 advertisements consistent and/or specific to the U.S.

6 22. Defendants' Websites utilize United States-based Google Analytics, a website traffic  
7 tracking services of Google, LLC to track its website analytics.

8 23. Defendants' use of U.S. vendors for domain name servers, privacy services, advertisers,  
9 geo-targeted ads and other services illustrate that Defendants are expressly aiming their web site and  
10 business at the United States Market.

11 24. Defendants' Websites, owned and/or operated by Defendants, expressly informed a user  
12 that may upload content to ThisAV that the user is expected to provide 2257 records (referring to 18  
13 U.S.C. § 2257) upon request. Defendants clearly intend and anticipate for U.S. viewers to use the  
14 ThisAV Web Site. In August 2022, after the 9<sup>th</sup> Circuit ruled on matters in this case (Case No. [21-](#)  
15 [35617](#)) in favor of Plaintiff, the U.S.C. § 2257 information was quickly removed from Defendants'  
16 Websites.

17 25. Defendants in this matter previously brought a motion to dismiss based upon lack of  
18 personal jurisdiction. That motion was successful in the District Court but reversed by the Ninth Circuit  
19 in *Will Co. v. Ka Yeung Lee*, 47 F.4th 917, 919 (9th Cir. 2022). There is no question that personal  
20 jurisdiction is appropriate in this case.

21 13. Upon information and belief, Defendants all transact business in this Judicial District by  
22 way of their interactive website and through their interactivity with United States and Washington  
23 residents who have been offered the infringing and unlawful content at issue herein and who have,  
24 themselves, engaged in acts of infringement in this District and State. The Court has personal  
25 jurisdiction over the Defendants, who have engaged in business activities in and directed to this District  
26

1 and have committed tortious acts within this District or directed at this District. The Defendants are  
 2 amenable to service of process pursuant to the state Long-Arm Statute, and Fed.R.Civ.P. 4(e).

3 14. Any alien defendant is subject to jurisdiction in any district. See 28 U.S.C. 1391 (“An  
 4 alien may be sued in any district.”) See also Fed. R. Civ. P. 4(k)(2).

5 15. This Court has subject matter jurisdiction over Plaintiff’s federal claims pursuant to 17  
 6 U.S.C. § 101 et seq., 28 U.S.C. §1331 and 28 U.S.C. §1338.

7 16. Venue is appropriate in this District pursuant to 28 U.S.C. § 1391(b) and/or (c).

8 17. This Court has personal jurisdiction pursuant to 28 U.S.C. §§ 1391(b), (c) and/or (d) and  
 9 28 U.S.C. § 1400(a).

### 10 **PARTIES**

11 13. Will Co. is, and at all relevant times was, a private limited liability company organized  
 12 under the laws of Japan, and has its head office at Tokyo, Japan.

13 14. Will Co., an award-winning Japanese entertainment company, is comprised of nearly  
 14 100 employees who manage over 37 registered trademarks and 50 brands, each of which explore and  
 15 deliver sensuality and sexuality through artistic photography, video, and erotic stories.

16 15. Since 2016, Will Co. has grown its video library to over 50,000 full length adult  
 17 entertainment movies, featuring over 5000 models shot by over 300 photographer/directors. Its brands  
 18 have grown into a globally recognized leader of Japanese sensual art garnering numerous industry  
 19 awards through the use of studios in Japan, exotic locations, high budget productions, engaging  
 20 storylines, famed photographers and directors coupled with the dedication from its artists and  
 21 technicians.

22 16. As Will Co. has expanded its library and expanded its reach to a United States audience,  
 23 Will Co. is registering copyrights with the U.S. Copyright Office.

24 17. Will Co. has registered with the United States Copyright Office the copyrighted works  
 25 identified in this Complaint. Will Co. has taken industry standard steps to identify its products. Plaintiff  
 26

1 videos and photographs are watermarked with Plaintiff readily identifiable logos and other content  
2 management information.

3 18. A schedule of the Will Co. copyrighted works at issue in this case thus far, which have  
4 been registered with the U.S. Copyright Office, is attached hereto as Schedule A (the “Subject Works”).

5 19. Will Co. is also the owner of multiple trademark and service mark registrations in Japan,  
6 and it has built common law trademark and service mark rights in the United States (collectively, the  
7 registered and unregistered marks shall be referred to as the “Marks”) A schedule of the Marks is  
8 attached hereto as Exhibit B. Many of the Marks are registered with English language equivalents,  
9 *e.g.*, MUTEKI, CROSS, E-BODY, FITCH, BEFREE, ROOKIE, kira☆kira and kuwaii\*.

10 20. Will Co. is the producer and exclusive licensor of its own motion pictures/content. Will  
11 Co. distributes its content through exclusive digital licensing with Digital Commerce Inc.. Digital  
12 Commerce, Inc. makes its products available through the website “Fanza.” Its goods are available in  
13 the United States. Its streaming service has temporarily halted in the United States, but it operated for  
14 years in the United States and was well-known within the relevant community, resulting in millions of  
15 dollars per month in revenues. Will Co. intends to begin its streaming service again in the United  
16 States. Will Co. also maintains separate websites available in the United States for its most popular  
17 brands, on such sites as: mutekimuteki.com.

18 21. Will Co. has never authorized or given consent to Defendants to use the Marks or  
19 Subject Works in the manner complained of herein.

20 22. Defendants’ own and operate Defendants’ Websites. Defendant Ka Yeung Lee  
21 (hereinafter “Lee”) is, upon information and belief, a resident of the Hong Kong Special  
22 Administrative Region of the People’s Republic of China.

23 23. Defendant Lee is listed as the client and payor in client information maintained by  
24 Gorilla Servers, Inc. for services provided to ThisAV Web Site. At the time of the initial filing, Gorilla  
25 Services, Inc. was the hosting company for ThisAV Web Site.  
26

24. Defendant Youhaha Marketing and Promotion Limited (hereinafter “Youhaha”) is, upon information and belief a company formed and registered in the Hong Kong Special Administrative Region of the People’s Republic of China.

25. Defendant Youhaha is listed as the client and payor in client information maintained by Gorilla Servers, Inc. for services provided to ThisAV Web Site. Gorilla Services, Inc. was the hosting company for ThisAV Web Site. Defendant Youhaha is also listed as the client and contact information for Tiger Media, providing ad broker services for ThisAV Web Site.

26. On information and belief, Defendants also operate the mirror websites Missav.com; (ii) [misav789.com](http://misav789.com); (iii) MyAV.com; (iv) VassIm.com; (iv) FiveTiu.com; and (v) EightCha.com. On information and belief, these are all the alter egos of Defendants Lee and Youhaha and the owners of ThisAV.com. MissAV.com and the other mirror sites display the same content in the same format as ThisAV.com and use the same source code.

27. Upon information and belief, Defendants’ Websites operate with full intention of broadcasting, distributing, or making available content in the United States and earning money from the United States market. It appears that the Defendants’ Websites utilize U.S.-based Cloudflare, Amakai Technologies, and other US services to deliver infringing content to end users. It is currently unknown where the owners and operators are located.

28. Defendants Does 2 through 20 are the owners, operators, shareholder executives, and affiliates of ThisAV Web Site. Will Co. is unaware of the true names or capacities of Does 1 through 20. Will Co. is informed and believes, and on that basis alleges, that Does 1 through 20 either (a) directly performed the acts alleged herein, (b) were acting as the agents, principals, alter egos, employees, or representatives of the owners and operators of the web sites, and/or (c) otherwise participated in the acts alleged herein with the owners and operators of the web sites. Accordingly, Does 1 through 20 each are liable for all the acts alleged herein because they were the cause in fact and proximate cause of all injuries suffered by Will Co. as alleged herein. Will Co. will amend the complaint to state the true names of Does 1 through 20 when their identities are discovered.

29. Will Co.'s streaming video services are not currently available in the United States. However, Will Co.'s brands are well-known in the United States. In the world of adult entertainment, there is a strong demand for new content, which usually arises in the context of new streams. Will Co.'s brands release several new streaming videos each day. The longer the videos are available, the less valuable they become to a significant sector of Plaintiff's potential customers. The videos are also released on DVD or other digital formats after they are released in streaming.

### **STATEMENT OF FACTS**

30. In addition to the valuable copyright assets identified above, Will Co. owns dozens of trademarks and service marks in relation to provision of videos and video-related goods and services (the "Marks"). Many of the Marks are registered in Japan. A list of Will Co.'s more popular Marks is attached hereto as Exhibit B.

31. For instance, some of the Marks include:

(i) KIRA ☆KIRA: Reg. No. 5750634 in IC 009 and 041, respectively, for "Image files that can be received and stored using the Internet; Recorded video discs and video tapes" and "Planning or operation of a movie, entertainment, drama or music performance; Production of videotape/video disc masters; Planning, operation or holding of a sports performance."

2. Kawaii\*: Reg. No. 5750637 in IC 09 and 041 for "Image files that can be received and stored using the Internet • Recorded video discs and video tapes" and "Planning or operation of a film, entertainment, drama or music performance; Production of videotape/video disc masters; Planning, operation or holding of a sports performance."

3. MUTEKI: Reg. No. 5734687 in IC 041 for "Planning or operation of a movie, entertainment, drama or music performance; Production of videotape/video disc masters; Planning, operation or holding of a sports performance."

32. Will's Marks are associated with high quality, adult-themed goods and services based around its studios and specialty brands. There are very few authorized outlets for Will's goods and

1 services. By controlling access to a limited number of providers, Will maintains a tight rein on the  
2 quality and source of its goods and services, which have very few authorized providers.

3 33. Will's Marks and brands are known around the world. As noted, a large percentage of  
4 the Internet traffic seeking of Defendants' infringing materials derives from the United States. On  
5 information and belief, those potential consumers are familiar with Will's brands and are confused as  
6 to the source of the materials on the Infringing Sites.

7 34. The Defendants' Websites display the Marks with identical goods and services as those  
8 produced by Plaintiff

9 35. In order to gain access to the massive amounts of pirated content, a user simply need  
10 only click on the website. Internet users can simply watch videos on Defendants' Websites for free  
11 without an account.

12 36. In order to gain access to all of the highly interactive web site represented functions,  
13 users of Defendants' Websites must sign up for an account.

14 37. The sign-up process for ThisAV Web Site requires entry of a username, password, and  
15 email address.

16 38. The process to view Defendants' Websites or secure an account does not require any  
17 age verification.

18 39. Prior to the August 2022 changes to the websites, the ThisAV Web Site frequently asked  
19 questions (FAQ) page, Defendants stated, "All newly uploaded videos need to be reviewed by the  
20 webmaster." The webmaster, upon information and belief, is one of Defendants or an agent of  
21 Defendants acting upon express authority and/or direction of Defendants.

22 40. Once a user has signed up, the user can, among other things, post videos or images for  
23 display on the Defendants' Websites.

24 41. Videos on Defendants' Websites may be shared on other sites via "embed links" that  
25 allow for posting on or to any social media site, website site, or via Email to anyone. Such functionality  
26

1 makes it impossible to know how many times and where an unlicensed copyrighted video has been  
2 posted and displayed illegally as a direct result of Defendant unlawful display.

3 42. Static banner advertisements exist on each page of Defendants' Websites, including  
4 advertisements expressly directed at United States viewers on behalf of United States companies.

5 43. When a user attempts to watch a video, the user will be shown advertisements.

6 44. Certain advertisements on Defendants' Websites are geo-targeted, meaning the  
7 operators of the Defendants' Websites have means to determine the general locale of each user and  
8 display advertisements consistent and/or specific to the locale, including the United States.

9 45. Defendants earn money from the various advertisement schemes on Defendants'  
10 Websites. The amount of money earned is directly related to the amount of traffic to Defendants'  
11 Websites and the number of videos watched on the site. Therefore, the quality of the videos on  
12 Defendants' Websites directly influences the revenue generated by Defendants.

13 46. To further drive traffic to Defendants' Websites and exploit Plaintiffs content,  
14 Defendants regularly post infringing content from Plaintiff to its @missav\_daily Twitter Account (now  
15 X) daily.

16 47. Defendants' Websites fails to fulfill the requisite conditions precedent to qualify for the  
17 safe harbor provisions of the DMCA. Specifically, Defendants' Websites do not have an appointed  
18 registered DMCA Agent. Further, Defendants fail to honor take-down notices sent to Defendants'  
19 Websites and have failed to implement a reasonable repeat infringer policy.

20 48. At the initial filing of this case, ThisAV Web Site displayed a DMCA Notice and a web  
21 page inclusive of industry-standard language with instructions for notifying ThisAV of alleged  
22 copyright infringements. However, a copyright holder following such instructions did not result in  
23 either removal of the infringing content nor a termination of an infringer if a repeat infringer.

24 49. Will Co.'s agents routinely police web sites to identify infringement of Will Co.'s  
25 copyrighted works. In the course of doing so, Will Co.'s agents discovered many of Will Co.'s  
26

1 copyrighted works have been made available, in full, to the public on the Defendants' Websites for free  
2 and without license or authorization from Will Co.

3 50. Specifically, it was discovered that Defendants' Websites displayed 50 of Plaintiff's  
4 copyright registered on each of Defendants' Websites identified herein. These copyright registered  
5 works are listed in Exhibits A, attached hereto. Defendants have no authority or license to display or  
6 distribute any portion of Plaintiffs' copyrighted works in the manner displayed or exploited by  
7 Defendants and as complained therein.

8 51. To date, Plaintiff has identified 1,738,686 Links to infringing use of 50,120 full length  
9 video titles on MissAV.com and ThisAV.com alone.

10 52. Plaintiff has identified and documented the infringing use of its copyright registered  
11 works on each of Defendants' Websites identified in this complaint.

12 53. Will Co. sent DMCA compliant takedown notices to Defendants' Websites pursuant to  
13 17 U.S.C. § 512(c) and the policy stated on ThisAV Web Site and to its service providers pursuant to  
14 their published policies.

15 54. None of Plaintiff's content was removed.

16 55. Defendants do not have a stated repeat infringer policy. Upon information and belief,  
17 Defendants have actual knowledge and clear notice of the infringement of Plaintiff's titles. Upon  
18 information and belief, Defendants are placing and making available for display Plaintiffs content and  
19 the associated data including the name of the actors, trademark brand, and owner information on the  
20 Defendants' Websites. The infringement is clear and obvious even to the most naïve observer.  
21 Plaintiff's copyrighted works are indexed, displayed, and distributed on Defendants' Websites through  
22 Defendants and the Doe Defendants acting in concert. Plaintiff's and other major producers' trademarks  
23 and DVD catalog number are used to index infringing material and other identifiers which is evidence  
24 of knowledge and intent by virtue of the conduct alleged herein. Defendants knowingly promote,  
25 participate in, facilitate, assist, enable, materially contribute to, encourage, and induce copyright  
26



1 infringement, and thereby have infringed, secondarily infringed, and induced infringement by others,  
2 the copyrights in Plaintiffs' copyrighted work.

3 56. Defendants manually review each video before that video being made available to the  
4 public. Defendants, either jointly, severally, actually, constructively, and with or without direct concert  
5 with one another, deprived Plaintiffs of the lawful monetary rewards that accompany its rights in the  
6 copyrighted works and Marks.

7 57. Defendants' disregard for copyright and trademark laws threaten Plaintiff's business.  
8 Defendants intentionally, knowingly, negligently, or through willful blindness avoided reasonable  
9 precautions to deter the rampant copyright infringement, unfair competition and trademark  
10 infringement on their website.

11 58. Defendants' acts and omissions allow them to profit from their infringement while  
12 imposing the burden of monitoring Defendants' website onto copyright holders, without sufficient  
13 means to prevent continued and unabated infringement.

14  
15 **FIRST CLAIM FOR RELIEF**  
16 **Copyright Infringement – 17 U.S.C. §§ 101 *et. seq.***  
**Against All Defendants**

17 59. Will Co. repeats, re-alleges, and incorporates by reference each preceding allegation set  
18 forth herein.

19 60. Will Co. is the owner of valid and registered copyrights in the Subject Works.

20 61. Will Co. registered each copyright with the United States Copyright Office.

21 62. Defendants have infringed, and are continuing to infringe, Will Co.'s copyrights by  
22 reproducing, adapting, distributing, publicly performing, and/or publicly displaying and authorizing  
23 others to reproduce, adapt, distribute, publicly perform, and/or publicly display copyrighted portions  
24 and elements of the Subject Works, and/or the Subject Works in their entirety, without authorization,  
25 in violation of the Copyright Act, 17 U.S.C. § 101 *et seq.*

26 63. Defendants did not have authority or license to copy and/or display the Subject Works.

1           64. Will Co. has never authorized or given consent to Defendants to use the Subject Works  
2 in the manner displayed and exploited by Defendants.

3           65. Defendants knew or reasonably should have known they did not have permission to  
4 exploit the Subject Works on the Defendants' Websites and further knew or should have known their  
5 acts constituted copyright infringement.

6           66. Defendants' acts of infringement are willful, in disregard of, and with indifference to  
7 the manner displayed and exploited by Defendants.

8           67. Defendants engaged in intentional, knowing, negligent, or willfully blind conduct  
9 sufficient to demonstrate they engaged actively in the improper collection and distribution of Plaintiffs'  
10 copyrighted works.

11           68. The quantity and quality of copyright files available to users increased the attractiveness  
12 of Defendants' service to its customers, increased its users base, and increased its ad sales revenue.

13           69. Based on information and belief, Defendants actively uploaded pirated copyrighted  
14 files, enabling users of Defendants' Websites to view copyrighted videos and images for free.

15           70. Defendants controlled the files owned by Will Co. and determined which files  
16 remained for display and distribution.

17           71. Defendants never implemented or enforced a "repeat infringer" policy.

18           72. Defendants either were aware, actually or constructively, should have been aware, or  
19 were willfully blind that pirated copyrighted materials comprised the most popular videos on the  
20 Defendants websites.

21           73. Defendants, through Defendants' Websites, affirmatively and willfully  
22 accommodated Internet traffic generated by the illegal acts.

23           74. Defendants' conduct was willful within the meaning of 17 U.S.C. § 101, *et seq.* At a  
24 minimum, Defendants acted with willful blindness and reckless disregard of Will Co.'s registered  
25 copyrights.

1           75. Because of their wrongful conduct, Defendants are liable to Will Co. for copyright  
2 infringement. See 17 U.S.C. §501. Plaintiff suffers and will continue to suffer substantial losses,  
3 including, but not limited to, damage to its business reputation and goodwill.

4           76. The law permits Plaintiff to recover damages, including readily ascertainable direct  
5 losses and all profits Defendants made by their wrongful conduct. 17 U.S.C. §504. Alternatively,  
6 the law permits Plaintiff to recover statutory damages. 17 U.S.C. §504(c).

7           77. Because of Defendants' willful infringement, the law permits enhancement of the  
8 allowable statutory damages. 17 U.S.C. §504(c) (2).

9           78. The law permits Plaintiff injunctive relief. 17 U.S.C. §502. Further, the law permits  
10 a Court Order impounding all infringing materials. 17 U.S.C. §503.

11           79. Because of Defendants' acts and conduct, Will Co. has sustained and will continued  
12 to sustain substantial, immediate, and irreparable injury, for which there is not adequate remedy  
13 at law. Unless enjoined and restrained by the Court, Defendants will continue to infringe Will  
14 Co.'s rights in the Subject Works. Will Co. is entitled to temporary, preliminary, and permanent  
15 injunctive relief to restrain and enjoin Defendants' continuing infringing conduct.

## 16 17 **SECOND CLAIM FOR RELIEF**

### 18 **Inducement of Copyright Infringement**

#### 19 **Against All Defendants**

20           80. Will Co. repeats, re-alleges, and incorporates by reference each preceding allegation set  
21 forth herein.

22           81. Defendants designed and/or distributed technology and/or devices and/or  
23 induced individuals to use this technology to promote the use of infringed and copyrighted material.  
24 As a direct and proximate result of Defendants' inducement, individuals infringed Will Co.'s  
25 copyrighted works. These individuals reproduced, distributed and publicly disseminated Will Co.'s  
26 copyrighted works through Defendants' website.

1           82. On information and belief, Defendants have encouraged the illegal uploading and  
2 downloading of Will Co.'s copyrighted works, thus inducing the unauthorized reproduction,  
3 adaptation, public display and/or distribution of copies of the Will Co.'s copyrighted works, and thus  
4 to the direct infringement of Will Co.'s copyrighted works.

5           83. Defendants' actions constitute inducing copyright infringement of Will Co.'s copyrights  
6 and exclusive rights under copyright in the Will Co.'s copyrighted works in violation of the Copyright  
7 Act, 17 U.S.C. §§ 106 and 501.

8           84. The infringement of Will Co.'s rights in and to each of the Will Co.'s copyrighted works  
9 constituted a separate and distinct infringement.

10           85. The acts of infringement by Defendants have been willful, intentional, purposeful and  
11 in reckless disregard of and with indifference to Will Co.'s rights.

12           86. As a direct and proximate result of the infringements by Defendants of Will Co.'s  
13 copyrights and exclusive rights under copyright in the Will Co.'s copyrighted works, Will Co. is  
14 entitled to its actual damages and Defendants' profits pursuant to 17 U.S.C. § 504(b).

15           87. Alternatively, Will Co. is entitled to maximum statutory damages, pursuant to 17 U.S.C.  
16 § 504(c), in the amount of \$150,000 with respect to each work infringed, or such other amounts as may  
17 be proper under 17 U.S.C. § 504(c).

18           88. Will Co. is further entitled to their attorneys' fees and full costs pursuant to 17 U.S.C. §  
19 505.

20           89. Because of Defendants' acts and conduct, Will Co. has sustained and will continue  
21 to sustain substantial, immediate, and irreparable injury, for which there is no adequate remedy at  
22 law. Unless enjoined and restrained by the Court, Defendants will continue to infringe Will Co.'s  
23 rights in the Subject Works. Will Co. is entitled to temporary, preliminary, and permanent  
24 injunctive relief to restrain and enjoin Defendants' continuing infringing conduct.

**THIRD CLAIM FOR RELIEF**  
**Vicarious and Contributory Inducement of Copyright Infringement**  
**Against All Defendants**

90. Plaintiff repeats, re-alleges, and incorporates by reference as though fully set forth herein, the allegations contained in the preceding paragraphs of this Complaint.

91. Defendants have systematically failed to take any action to remove infringing content from the Infringing Sites.

92. Plaintiff is informed and believes and thereon alleges that Defendants, and each of them, knowingly induced, participated in, aided and abetted, and resultantly profited from the illegal reproduction, distribution, display, and/or creation of derivative works based on the Subject Works as alleged herein.

93. Plaintiff is informed and believes and thereon alleges that Defendants, and each of them, are vicariously liable for the infringement alleged herein because they had the right and ability to supervise the infringing conduct and because they had a direct financial interest in the infringing conduct.

94. Plaintiff is informed and believes and on that basis alleges that Defendants, and each of them, are contributory infringers because each knew or had reason to know of the infringing activity and that Defendants intentionally and materially contributed to the infringing activity.

95. By reason of the Defendants', and each of their, acts of contributory and/or vicarious infringement as alleged above, Plaintiff has suffered and will continue to suffer substantial damages to its business in an amount to be established at trial.

96. By reason of the Defendants' and each of their acts of contributory and/or vicarious infringement as alleged above, Plaintiff has suffered and will continue to suffer general and special damages to its business in an amount to be established at trial.

97. Due to Defendants' acts of contributory and/or vicarious copyright infringement, Defendants, and each of them, have obtained direct and indirect profits they would otherwise not have realized but for their infringement of the Subject Works. As such, Plaintiff is entitled to

1 disgorgement of Defendants' profits, directly and indirectly, attributable to Defendants' infringement  
2 of the Subject Works in an amount to be established at trial.

3 98. Plaintiff is informed and believes and thereupon alleges that Defendants, and each of  
4 them, have continued to infringe Plaintiff's copyright rights. Therefore, Defendants' acts of copyright  
5 infringement as alleged above were, and continue to be, willful, intentional, and malicious, subjecting  
6 Defendants, and each of them, to liability, therefore. Further, Defendants, and each of them, willfully  
7 and intentionally misappropriated, palmed-off, and/or infringed Plaintiff's Subject Works which  
8 renders Defendants, and each of them, liable for damages as described herein.

9 **FOURTH CLAIM FOR RELIEF**

10 **(Trademark Infringement, False Designation of Origin and Unfair Competition -- Against All**  
11 **Defendants)**

12 99. Plaintiff realleges and incorporates in this cause of action all previous paragraphs of  
13 this complaint.

14 100. This claim for relief arises under 15 U.S.C. § 1125(a)(1)(A) and is alleged against all  
15 Defendants.

16 101. Plaintiff is the owner of the Marks and is entitled to sole use of those Marks in relation  
17 to the business, goodwill and services associated with the Marks.

18 102. None of the Defendants named herein have any claim or colorable right to utilize the  
19 name Marks either in connection with goods or services related vidoes.

20 103. Plaintiff's Marks function as designations origin that identify Plaintiff as the exclusive  
21 source of adult-themed videos and video-related services, and distinguish Plaintiff's goods from the  
22 goods of others in the marketplace.

23 104. Defendants' use of Plaintiff's Marks in connection with its goods constitutes false  
24 designation or origin and/or false or misleading representation. Defendants' use of identical or  
25 confusingly similar variations of Plaintiff's Marks is likely to cause confusion, or mistake, or to  
26 deceive others into believing that Defendants' products are manufactured, offered, sponsored,

1 authorized, licensed, of similar quality to, or otherwise connected or affiliated with Plaintiff and  
2 Plaintiff's goods and services.

3 105. Such false designation of origin and or representation constitutes unfair  
4 competition and is an infringement of Plaintiff's rights in its Marks in violation of § 43(a) of the  
5 Lanham Act, 15 U.S.C. § 1125(a).

6 106. On information and belief, Defendants' acts are deliberate and intended to confuse the  
7 public as to the source of the Defendants' goods and services, to injure Plaintiff, and to reap the  
8 benefits of Plaintiff's goodwill associated with Plaintiffs' Marks.

9 107. As a direct and proximate result of Defendants' willful and unlawful conduct,  
10 Defendant has damaged and will continue to damage Plaintiff's business, market, reputation, and  
11 goodwill, and may discourage current and potential customers from dealing with Plaintiff. Such  
12 irreparable damage will continue unless Defendant is enjoined from infringing Plaintiff's Marks.

13 108. In light of the foregoing, Plaintiff is entitled to injunctive relief prohibiting Defendants  
14 from using Plaintiff's Marks or any confusingly similar Marks for any purpose, and to recover from  
15 Defendant all damages that Plaintiff has sustained and will sustain as a result of such infringing acts,  
16 and all gains, profits and advantages obtained by Plaintiff as a result thereof, in an amount not yet  
17 known well, as well as the costs of this action pursuant to 15 U.S.C. § 1117(a) and attorneys' fees and  
18 treble damages pursuant to 15 U.S.C. § 1117(b).

19 109. Pursuant to 15 U.S.C. § 1118, Plaintiff also asks the Court for an order forcing  
20 Defendant to deliver up for destruction all products, labels, signs, prints, advertisements, and other  
21 articles in Defendants' possession that infringe upon Plaintiff's rights.

22 110. Defendants' acts have damaged and will continue to damage Plaintiff, and Plaintiff has  
23 no adequate remedy at law.

24 111. Defendants are using Plaintiff's Marks so as to cause confusion as to Plaintiff's  
25 association with, affiliation with, or sponsorship of Plaintiff's goods and services.  
26

1 112. Plaintiffs are informed and believe that the acts of Defendants complained of herein  
2 were undertaken willfully and with the intention of causing confusion, mistake or deception.

3 113. Monetary relief alone is not adequate to address fully the irreparable injury that  
4 defendants' illegal actions have caused and will continue to cause Plaintiff if Defendants' actions are  
5 not enjoined. Plaintiff will therefore also be entitled to preliminary and permanent injunctive relief to  
6 stop the ongoing acts of unfair competition and other violations by Defendant and anyone acting in  
7 concert with it.

8 **FIFTH CLAIM FOR RELIEF**

9 **(Dilution – Against all Defendants)**

10 114. Plaintiff realleges and incorporates in this cause of action all previous paragraphs of  
11 this Complaint.

12 115. This claim for relief arises under section 43(c) of the Lanham Act, 15 U.S.C. § 1125(c)  
13 and is alleged against all defendants.

14 116. Plaintiff is the owner of the valuable, famous Marks associated with provision of  
15 video-related goods and services, and is entitled to sole use and ownership of the business, goodwill  
16 of those Marks.

17 117. Plaintiff's Marks have become famous throughout the United States, through use in  
18 the in connection with its high quality, regulation-compliant videos. Accordingly, it is entitled to  
19 protection under § 1125(c).

20 118. Defendants' unauthorized use of Plaintiff's trade names and Marks does and will  
21 dilute the distinctive quality of the trade name and marks and will diminish and destroy the public  
22 association of the trade name and Marks with Plaintiff.

23 119. In engaging in the actions complained of above, Defendants and each of them willfully  
24 intended and intend to trade on the reputation of Plaintiff's Marks.

25 120. In engaging in the actions complained of above, Defendants and each of them have  
26 willfully intended to cause dilution of the famous trade names and marks belonging to Plaintiff.



1 For each act violating Plaintiff's rights, Plaintiff is entitled to recover actual damages as well as  
2 Defendants' profits from such infringement.

3 121. Plaintiff is informed and believes that the acts of Defendants complained of herein  
4 were undertaken willfully and intentionally by Defendants.

5 122. Monetary relief alone is not adequate to address fully the irreparable injury that  
6 Defendants' illegal actions have caused and will continue to cause Plaintiff if Defendants' acts are not  
7 enjoined. Plaintiff is therefore also entitled to preliminary and permanent injunctive relief to stop  
8 Defendants' ongoing violations as well as those of anyone acting in concert with them.

9 **SIXTH CLAIM FOR RELIEF**

10 **(Washington Common Law Trademark Infringement)**

11 123. Plaintiff realleges and incorporates by this reference each and every allegation set forth  
12 in the paragraphs.

13 124. Defendants' use of Plaintiff's Marks has infringed on its distinctive features in a  
14 manner that tends to confuse, in the public mind, Plaintiff's products with others.

15 125. Defendants' acts, as above alleged, constitute infringement of Plaintiff's Marks in  
16 violation of the common law.

17 126. Plaintiff has been and continues to be damaged in a manner that cannot be fully  
18 measured or compensated in economic terms and for which there is no adequate remedy at law. The  
19 actions of Defendant has damaged and will continue to damage Plaintiff's market, reputation, and  
20 goodwill.

21 127. Plaintiff has been damaged by Defendants' actions in an amount to be proven at trial.

22 **SEVENTH CLAIM FOR RELIEF**

23 **(Unfair Business Practices — RCW 19.86 *et seq.*)**

24 128. Plaintiff realleges and incorporates by this reference each and every allegation set forth  
25 in paragraphs above.

1 129. Defendants' use of Plaintiff's Marks to promote, market, or sell products in  
2 Washington constitutes an unfair business practice pursuant to RCW 19.86 *et seq.*

3 130. Defendants' use of Plaintiff's Marks is an unfair or deceptive practice occurring in  
4 trade or commerce that impacts the public interest and has caused injury to Plaintiff.

5 131. Defendants' actions violate RCW 19.86 *et seq.*

6 **EIGHTH CLAIM FOR RELIEF**

7 ***(Washington Common Law Unfair Competition)***

8 132. Plaintiff realleges and incorporates by this reference each and every allegation set  
9 forth in the paragraphs above.

10 44. Defendants' use of Plaintiff's Marks has used the Marks in a manner that tends to confuse,  
11 in the public mind, Plaintiff's products and/or advertising with the products and/or advertising of  
12 others.

13 45. The acts of Defendant complained of herein constitute unfair competition in  
14 violation of Washington common law.

15  
16  
17 **PRAYER FOR RELIEF**

18 WHEREFORE, Plaintiff Will Co. Ltd prays that this Court enter judgment in its favor on each  
19 and every claim for relief set forth above and award Will Co. relief including, but not limited to, an  
20 Order:

21 A. Preliminarily and permanently enjoining Defendants, their agents, servants, officers,  
22 directors, employees, attorneys, privies, representatives, successors and assigns and parent and  
23 subsidiary corporations or other related entities, and any or all persons acting in concert or participation  
24 with any of them, or under their direction or control, from any of the following activities:

25 (1) Hosting, linking to, distributing, reproducing, copying, downloading, uploading,  
26 making available for download, indexing, displaying, exhibiting, publicly performing,  
communicating to the public, streaming, transmitting, or otherwise exploiting or making

1 any use of any of Will Co.'s copyrighted works, including the Subject Works, or any  
2 portion(s) thereof in any form;

3 (2) Enabling, facilitating, permitting, assisting, soliciting, encouraging or inducing,  
4 whether directly or indirectly, any user or other third party (i) to host, link to, distribute,  
5 reproduce, copy, download, upload, make available for download, index, display,  
6 exhibit, publicly perform, communicate to the public, stream, transmit, or otherwise  
7 exploit or make any use of Will Co.'s copyrighted works, including the Subject Works,  
8 or portion(s) thereof; or (ii) to make available any of Will Co.'s copyrighted works,  
9 including the Subject Works, for hosting, linking to, distributing, reproducing, copying,  
10 downloading, uploading, making available for download, indexing, displaying,  
11 exhibiting, publicly performing, communicating to the public, streaming, transmitting,  
12 or other exploitation or use;

13 (3) Using, operating, maintaining, distributing, or supporting any computer server,  
14 website, software, domain name, email address, social media account, bank account, or  
15 payment processing system in connection with the hosting, linking to, distributing,  
16 reproducing, copying, downloading, uploading, making available for download,  
17 indexing, displaying, exhibiting, publicly performing, communicating to the public,  
18 streaming, transmitting, or other exploitation or use of any of Will Co.'s copyrighted  
19 works, including the Subject Works;

20 (4) Enabling, facilitating, permitting, assisting, soliciting, encouraging or inducing,  
21 whether directly or indirectly, any user or other third party to visit any website,  
22 including but not limited to any website operated by Defendants, that hosts, links to,  
23 distributes, reproduces, copies, downloads, uploads, makes available for download,  
24 indexes, displays, exhibits, publicly performs, communicates to the public, streams,  
25 transmits, or otherwise exploits or makes any use of Will Co.'s copyrighted works,  
26 including the Subject Works, or portion(s) thereof;

(5) Transferring or performing any function that results in the transfer of the registration of the domain name of Defendants' Websites including MissAV.com, ThisAV.com, MyAV.com, MissAV789.com, to any other registrant or registrar; and

(6) Assisting, aiding or abetting any other person or business entity in engaging in or performing any of the activities referred to in this Paragraph.

B. Requiring Defendants and their officers, servants, employees, agents and any persons who are, or on notice and upon continued provision of services would be, in active concert or participation with them, including but not limited to the domain name registrars and registries administering, holding, listing, or otherwise having control over the Defendants' Websites or any other domain name used in conjunction with Defendants' infringing activities, to transfer such domain name to Will Co.'s ownership and control, including, *inter alia*, by changing the registrar of record to the registrar of Will Co.'s choosing, unless Will Co. requests that such domain name be held and/or released rather than transferred.

C. Requiring Defendants, their agents, servants, officers, directors, employees, attorneys, privies, representatives, successors and assigns and parent and subsidiary corporations or other related entities, and any or all persons or entity acting in concert or participation with any of them, or under their direction or control, including any internet search engines, web hosting and Internet service providers, domain name registrars, domain name registries and other service or software providers, within five (5) business days from the issuance of this Order:

(1) To block or attempt to block access by United States users of Defendants' Websites including MissAV.com, ThisAV.com, MyAV.com, MissAV789.com, by blocking or attempting to block access to all domains, subdomains, URLs, and/or IP Addresses that has as its sole or predominant purpose to enable to facilitate access to Defendants' Websites including MissAV.com, ThisAV.com, MyAV.com, MissAV789.com,;

1 (2) To re-route all domains, subdomains, URLs, and/or IP Addresses that provides  
2 access to each and every URL available from each of Defendants' Websites and its  
3 domains and subdomains.

4 D. That the Court issue preliminary and permanent injunctive relief against Defendant, and that  
5 Defendant, its officers, agents, representatives, servants, employees, attorneys, successors and  
6 assignees, and all others in active concert or participation with Defendant, be enjoined and restrained  
7 from offering for sale, marketing, or selling any product which uses the Marks or any confusing similar  
8 designation;

9 E. That the Court find Defendant's acts complained of herein unlawful as constituting unfair  
10 competition, false designation of origin, trademark and service mark infringement, and unjust  
11 enrichment under the causes of action asserted in this Second Amended Complaint;

12 F. That the Court require that Defendant deliver up for destruction all products, labels, signs,  
13 prints, advertisements, and other articles that infringe Plaintiff's Marks, or are a result of any false  
14 designation of origin or unfair competition by Defendant;

15 G. That the Court order an accounting of all gains, profits and advantages derived from  
16 Defendant's wrongful acts;

17 H. That Defendants be ordered to file with the Court and serve upon Plaintiff, within thirty  
18 (30) after the entry of an injunction, a report in writing and under oath, setting forth in detail the manner  
19 and form in which Defendants have complied with any ordered injunction;

20 I. That Plaintiff be awarded statutory damages in an amount to be determined at trial for  
21 all infringing activities, or actual damages including Plaintiff's damages and lost profits, Defendants'  
22 profit;

23 J. That Defendants be ordered to account to Plaintiff for all profits, gains and advantages  
24 that they have realized as a consequence of their unauthorized use of Plaintiff's copyrighted works;

25 K. That Plaintiff be awarded enhanced damages and attorney's fees;

26 L. That Plaintiff be awarded pre-judgment and post-judgment interest;

1 M. That Plaintiff be awarded costs and expenses incurred in prosecuting this action,  
2 including expert witness fees;  
3 and

4 N. That such other and further preliminary and permanent relief be awarded to Plaintiff as  
5 the Court deems appropriate.

6  
7  
8 **DEMAND FOR JURY TRIAL**

9 Plaintiff hereby respectfully demands a jury trial as provided by Rule 38(a) of the Federal Rules  
10 of Civil Procedure.

11  
12 DATED: April 22, 2024

13 **FREEMAN LAW FIRM, INC.**

14  
15 By: s/ Spencer Freeman  
16 Spencer D. Freeman, WSBA No. 25069  
17 1107 ½ Tacoma Avenue South  
18 Tacoma, Washington 98042  
19 253-383-4500  
20 253-383-45101 (fax)  
21 sfreeman@freemanlawfirm.org  
22 sierra@freemanlawfirm.org  
23 *Counsel for Plaintiff Will Co. Ltd*

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(213) 785-8070  
(213) 995-5010 (fax)  
eric.bjorgum@kb-ip.com  
*Counsel for Will Co Ltd.*  
(Moving for Admission pro hac vice)

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# **Exhibit A**



**Exhibit A****Domain Name: THISAV.COM****Registrations: 50**

<b>Copyright Registration #</b>	<b>Title</b>	<b>Infringing Link</b>
PA0002245467	IPX-394	<a href="https://thisav.com/dm57/en/ipx-394">https://thisav.com/dm57/en/ipx-394</a>
PA0002245468	IPX-398	<a href="https://thisav.com/dm64/en/ipx-398">https://thisav.com/dm64/en/ipx-398</a>
PA0002246147	SSNI-703	<a href="https://thisav.com/dm45/en/ssni-703">https://thisav.com/dm45/en/ssni-703</a> <a href="https://thisav.com/dm39/en/ssni-703-uncensored-leak">https://thisav.com/dm39/en/ssni-703-uncensored-leak</a>
PA0002246148	SSNI-683	<a href="https://thisav.com/dm32/en/ssni-683">https://thisav.com/dm32/en/ssni-683</a>
PA0002246149	SSNI-655	<a href="https://thisav.com/dm44/en/ssni-655">https://thisav.com/dm44/en/ssni-655</a>
PA0002246150	SSNI-205	<a href="https://thisav.com/dm44/en/ssni-205">https://thisav.com/dm44/en/ssni-205</a> <a href="https://thisav.com/dm39/en/ssni-205-uncensored-leak">https://thisav.com/dm39/en/ssni-205-uncensored-leak</a>
PA0002246151	SSNI-678	<a href="https://thisav.com/dm47/en/ssni-678">https://thisav.com/dm47/en/ssni-678</a>
PA0002246152	SSNI-182	<a href="https://thisav.com/dm44/en/ssni-182">https://thisav.com/dm44/en/ssni-182</a>
PA0002246153	SSNI-152	<a href="https://thisav.com/dm53/en/ssni-152">https://thisav.com/dm53/en/ssni-152</a> <a href="https://thisav.com/dm16/en/ssni-152-uncensored-leak">https://thisav.com/dm16/en/ssni-152-uncensored-leak</a>
PA0002246209	SSNI-675	<a href="https://thisav.com/dm45/en/ssni-675">https://thisav.com/dm45/en/ssni-675</a> <a href="https://thisav.com/dm39/en/ssni-675-uncensored-leak">https://thisav.com/dm39/en/ssni-675-uncensored-leak</a>
PA0002246213	SSNI-135	<a href="https://thisav.com/dm39/en/ssni-135">https://thisav.com/dm39/en/ssni-135</a>
PA0002246223	SSNI-127	<a href="https://thisav.com/dm31/en/ssni-127">https://thisav.com/dm31/en/ssni-127</a>
PA0002246228	SSNI-117	<a href="https://thisav.com/dm31/en/ssni-117">https://thisav.com/dm31/en/ssni-117</a>
PA0002246234	SSNI-101	<a href="https://thisav.com/dm45/en/ssni-101">https://thisav.com/dm45/en/ssni-101</a> <a href="https://thisav.com/dm39/en/ssni-101-uncensored-leak">https://thisav.com/dm39/en/ssni-101-uncensored-leak</a>
PA0002246244	SSNI-012	<a href="https://thisav.com/dm26/en/ssni-012">https://thisav.com/dm26/en/ssni-012</a>
PA0002246265	MIAE-332	<a href="https://thisav.com/dm40/en/miae-332">https://thisav.com/dm40/en/miae-332</a>
PA0002246268	SSNI-687	<a href="https://thisav.com/dm44/en/ssni-687">https://thisav.com/dm44/en/ssni-687</a>
PA0002246271	MIAD-963	<a href="https://thisav.com/dm48/en/miad-963">https://thisav.com/dm48/en/miad-963</a>
PA0002246273	MIDE-430	<a href="https://thisav.com/dm52/en/mide-430">https://thisav.com/dm52/en/mide-430</a>
PA0002246278	SSNI-674	<a href="https://thisav.com/dm47/en/ssni-674">https://thisav.com/dm47/en/ssni-674</a> <a href="https://thisav.com/dm39/en/ssni-674-uncensored-leak">https://thisav.com/dm39/en/ssni-674-uncensored-leak</a>
PA0002246282	SSNI-663	<a href="https://thisav.com/dm45/en/ssni-663">https://thisav.com/dm45/en/ssni-663</a>
PA0002246285	MIDE-677	<a href="https://thisav.com/dm59/en/mide-677">https://thisav.com/dm59/en/mide-677</a>
PA0002246288	IPX-113	<a href="https://thisav.com/dm44/en/ipx-113">https://thisav.com/dm44/en/ipx-113</a>
PA0002246289	IPX-222	<a href="https://thisav.com/dm57/en/ipx-222">https://thisav.com/dm57/en/ipx-222</a>
PA0002246290	IPX-362	<a href="https://thisav.com/dm58/en/ipx-362">https://thisav.com/dm58/en/ipx-362</a>
PA0002246291	SSNI-143	<a href="https://thisav.com/dm45/en/ssni-143">https://thisav.com/dm45/en/ssni-143</a>
PA0002246292	SSNI-657	<a href="https://thisav.com/dm46/en/ssni-657">https://thisav.com/dm46/en/ssni-657</a>
PA0002246294	SSNI-192	<a href="https://thisav.com/dm48/en/ssni-192">https://thisav.com/dm48/en/ssni-192</a> <a href="https://thisav.com/en/ssni-192-uncensored-leak">https://thisav.com/en/ssni-192-uncensored-leak</a>
PA0002246297	MIDE-678	<a href="https://thisav.com/dm57/en/mide-678">https://thisav.com/dm57/en/mide-678</a> <a href="https://thisav.com/dm26/en/mide-678-uncensored-leak">https://thisav.com/dm26/en/mide-678-uncensored-leak</a>
PA0002246298	MIDE-683	<a href="https://thisav.com/dm57/en/mide-683">https://thisav.com/dm57/en/mide-683</a>
PA0002247253	SSNI-054	<a href="https://thisav.com/dm45/en/ssni-054">https://thisav.com/dm45/en/ssni-054</a> <a href="https://thisav.com/en/ssni-192-uncensored-leak">https://thisav.com/en/ssni-192-uncensored-leak</a>

PA0002247254	SSNI-207	<a href="https://thisav.com/dm44/en/ssni-207">https://thisav.com/dm44/en/ssni-207</a>
PA0002247255	SSNI-214	<a href="https://thisav.com/dm56/en/ssni-214">https://thisav.com/dm56/en/ssni-214</a>
PA0002247257	SSNI-215	<a href="https://thisav.com/dm44/en/ssni-215">https://thisav.com/dm44/en/ssni-215</a>
PA0002247258	SSNI-221	<a href="https://thisav.com/dm45/en/ssni-221">https://thisav.com/dm45/en/ssni-221</a> <a href="https://thisav.com/dm39/en/ssni-221-uncensored-leak">https://thisav.com/dm39/en/ssni-221-uncensored-leak</a>
PA0002247260	SSNI-236	<a href="https://thisav.com/dm44/en/ssni-236">https://thisav.com/dm44/en/ssni-236</a>
PA0002247264	SSNI-242	<a href="https://thisav.com/dm45/en/ssni-242">https://thisav.com/dm45/en/ssni-242</a>
PA0002247265	SSNI-266	<a href="https://thisav.com/dm44/en/ssni-266">https://thisav.com/dm44/en/ssni-266</a> <a href="https://thisav.com/en/ssni-266-uncensored-leak">https://thisav.com/en/ssni-266-uncensored-leak</a>
PA0002247266	SSNI-254	<a href="https://thisav.com/dm44/en/ssni-254">https://thisav.com/dm44/en/ssni-254</a>
PA0002247268	SSNI-268	<a href="https://thisav.com/dm44/en/ssni-268">https://thisav.com/dm44/en/ssni-268</a> <a href="https://thisav.com/dm39/en/ssni-268-uncensored-leak">https://thisav.com/dm39/en/ssni-268-uncensored-leak</a>
PA0002247270	SSNI-297	<a href="https://thisav.com/dm57/en/ssni-297">https://thisav.com/dm57/en/ssni-297</a>
PA0002247271	SSNI-573	<a href="https://thisav.com/dm44/en/ssni-573">https://thisav.com/dm44/en/ssni-573</a>
PA0002247272	SSNI-644	<a href="https://thisav.com/dm45/en/ssni-644">https://thisav.com/dm45/en/ssni-644</a> <a href="https://thisav.com/dm39/en/ssni-644-uncensored-leak">https://thisav.com/dm39/en/ssni-644-uncensored-leak</a>
PA0002247273	SSNI-645	<a href="https://thisav.com/dm47/en/ssni-645">https://thisav.com/dm47/en/ssni-645</a> <a href="https://thisav.com/dm1/en/ssni-645-uncensored-leak">https://thisav.com/dm1/en/ssni-645-uncensored-leak</a>
PA0002247278	SSNI-646	<a href="https://thisav.com/dm46/en/ssni-646">https://thisav.com/dm46/en/ssni-646</a> <a href="https://thisav.com/dm39/en/ssni-646-uncensored-leak">https://thisav.com/dm39/en/ssni-646-uncensored-leak</a>
PA0002247281	SSNI-730	<a href="https://thisav.com/dm45/en/ssni-730">https://thisav.com/dm45/en/ssni-730</a> <a href="https://thisav.com/dm38/en/ssni-730-uncensored-leak">https://thisav.com/dm38/en/ssni-730-uncensored-leak</a>
PA0002247282	MEYD-435	<a href="https://thisav.com/dm44/en/meyd-435">https://thisav.com/dm44/en/meyd-435</a>
PA0002247283	SSNI-731	<a href="https://thisav.com/dm59/en/ssni-731">https://thisav.com/dm59/en/ssni-731</a>
PA0002247284	SSNI-737	<a href="https://thisav.com/dm44/en/ssni-737">https://thisav.com/dm44/en/ssni-737</a>
PA0002247287	WANZ-562	<a href="https://thisav.com/dm57/en/wanz-562">https://thisav.com/dm57/en/wanz-562</a>

**Domain Name: MISSAV.COM**

**Registrations: 50**

Copyright Registration #	Title	Infringing Link
PA0002245467	IPX-394	<a href="https://missav.com/dm57/en/ipx-394">https://missav.com/dm57/en/ipx-394</a>
PA0002245468	IPX-398	<a href="https://missav.com/dm64/en/ipx-398">https://missav.com/dm64/en/ipx-398</a>
PA0002246147	SSNI-703	<a href="https://missav.com/dm45/en/ssni-703">https://missav.com/dm45/en/ssni-703</a> <a href="https://missav.com/dm39/en/ssni-703-uncensored-leak">https://missav.com/dm39/en/ssni-703-uncensored-leak</a>
PA0002246148	SSNI-683	<a href="https://missav.com/dm32/en/ssni-683">https://missav.com/dm32/en/ssni-683</a>
PA0002246149	SSNI-655	<a href="https://missav.com/dm44/en/ssni-655">https://missav.com/dm44/en/ssni-655</a>
PA0002246150	SSNI-205	<a href="https://missav.com/dm44/en/ssni-205">https://missav.com/dm44/en/ssni-205</a> <a href="https://missav.com/dm39/en/ssni-205-uncensored-leak">https://missav.com/dm39/en/ssni-205-uncensored-leak</a>
PA0002246151	SSNI-678	<a href="https://missav.com/dm47/en/ssni-678">https://missav.com/dm47/en/ssni-678</a>
PA0002246152	SSNI-182	<a href="https://missav.com/dm44/en/ssni-182">https://missav.com/dm44/en/ssni-182</a>
PA0002246153	SSNI-152	<a href="https://missav.com/dm53/en/ssni-152">https://missav.com/dm53/en/ssni-152</a> <a href="https://missav.com/dm16/en/ssni-152-uncensored-leak">https://missav.com/dm16/en/ssni-152-uncensored-leak</a>
PA0002246209	SSNI-675	<a href="https://missav.com/dm45/en/ssni-675">https://missav.com/dm45/en/ssni-675</a> <a href="https://missav.com/dm39/en/ssni-675-uncensored-leak">https://missav.com/dm39/en/ssni-675-uncensored-leak</a>

PA0002246213	SSNI-135	<a href="https://missav.com/dm39/en/ssni-135">https://missav.com/dm39/en/ssni-135</a>
PA0002246223	SSNI-127	<a href="https://missav.com/dm31/en/ssni-127">https://missav.com/dm31/en/ssni-127</a>
PA0002246228	SSNI-117	<a href="https://missav.com/dm31/en/ssni-117">https://missav.com/dm31/en/ssni-117</a>
PA0002246234	SSNI-101	<a href="https://missav.com/dm45/en/ssni-101">https://missav.com/dm45/en/ssni-101</a> <a href="https://missav.com/dm39/en/ssni-101-uncensored-leak">https://missav.com/dm39/en/ssni-101-uncensored-leak</a>
PA0002246244	SSNI-012	<a href="https://missav.com/dm26/en/ssni-012">https://missav.com/dm26/en/ssni-012</a>
PA0002246265	MIAE-332	<a href="https://missav.com/dm40/en/miae-332">https://missav.com/dm40/en/miae-332</a>
PA0002246268	SSNI-687	<a href="https://missav.com/dm44/en/ssni-687">https://missav.com/dm44/en/ssni-687</a>
PA0002246271	MIAD-963	<a href="https://missav.com/dm48/en/miad-963">https://missav.com/dm48/en/miad-963</a>
PA0002246273	MIDE-430	<a href="https://missav.com/dm52/en/mide-430">https://missav.com/dm52/en/mide-430</a>
PA0002246278	SSNI-674	<a href="https://missav.com/dm47/en/ssni-674">https://missav.com/dm47/en/ssni-674</a> <a href="https://missav.com/dm39/en/ssni-674-uncensored-leak">https://missav.com/dm39/en/ssni-674-uncensored-leak</a>
PA0002246282	SSNI-663	<a href="https://missav.com/dm45/en/ssni-663">https://missav.com/dm45/en/ssni-663</a>
PA0002246285	MIDE-677	<a href="https://missav.com/dm59/en/mide-677">https://missav.com/dm59/en/mide-677</a>
PA0002246288	IPX-113	<a href="https://missav.com/dm44/en/ipx-113">https://missav.com/dm44/en/ipx-113</a>
PA0002246289	IPX-222	<a href="https://missav.com/dm57/en/ipx-222">https://missav.com/dm57/en/ipx-222</a>
PA0002246290	IPX-362	<a href="https://missav.com/dm58/en/ipx-362">https://missav.com/dm58/en/ipx-362</a>
PA0002246291	SSNI-143	<a href="https://missav.com/dm45/en/ssni-143">https://missav.com/dm45/en/ssni-143</a>
PA0002246292	SSNI-657	<a href="https://missav.com/dm46/en/ssni-657">https://missav.com/dm46/en/ssni-657</a>
PA0002246294	SSNI-192	<a href="https://missav.com/dm48/en/ssni-192">https://missav.com/dm48/en/ssni-192</a> <a href="https://missav.com/en/ssni-192-uncensored-leak">https://missav.com/en/ssni-192-uncensored-leak</a>
PA0002246297	MIDE-678	<a href="https://missav.com/dm57/en/mide-678">https://missav.com/dm57/en/mide-678</a> <a href="https://missav.com/dm26/en/mide-678-uncensored-leak">https://missav.com/dm26/en/mide-678-uncensored-leak</a>
PA0002246298	MIDE-683	<a href="https://missav.com/dm57/en/mide-683">https://missav.com/dm57/en/mide-683</a>
PA0002247253	SSNI-054	<a href="https://missav.com/dm45/en/ssni-054">https://missav.com/dm45/en/ssni-054</a> <a href="https://missav.com/en/ssni-192-uncensored-leak">https://missav.com/en/ssni-192-uncensored-leak</a>
PA0002247254	SSNI-207	<a href="https://missav.com/dm44/en/ssni-207">https://missav.com/dm44/en/ssni-207</a>
PA0002247255	SSNI-214	<a href="https://missav.com/dm56/en/ssni-214">https://missav.com/dm56/en/ssni-214</a>
PA0002247257	SSNI-215	<a href="https://missav.com/dm44/en/ssni-215">https://missav.com/dm44/en/ssni-215</a>
PA0002247258	SSNI-221	<a href="https://missav.com/dm45/en/ssni-221">https://missav.com/dm45/en/ssni-221</a> <a href="https://missav.com/dm39/en/ssni-221-uncensored-leak">https://missav.com/dm39/en/ssni-221-uncensored-leak</a>
PA0002247260	SSNI-236	<a href="https://missav.com/dm44/en/ssni-236">https://missav.com/dm44/en/ssni-236</a>
PA0002247264	SSNI-242	<a href="https://missav.com/dm45/en/ssni-242">https://missav.com/dm45/en/ssni-242</a>
PA0002247265	SSNI-266	<a href="https://missav.com/dm44/en/ssni-266">https://missav.com/dm44/en/ssni-266</a> <a href="https://missav.com/en/ssni-266-uncensored-leak">https://missav.com/en/ssni-266-uncensored-leak</a>
PA0002247266	SSNI-254	<a href="https://missav.com/dm44/en/ssni-254">https://missav.com/dm44/en/ssni-254</a>
PA0002247268	SSNI-268	<a href="https://missav.com/dm44/en/ssni-268">https://missav.com/dm44/en/ssni-268</a> <a href="https://missav.com/dm39/en/ssni-268-uncensored-leak">https://missav.com/dm39/en/ssni-268-uncensored-leak</a>
PA0002247270	SSNI-297	<a href="https://missav.com/dm57/en/ssni-297">https://missav.com/dm57/en/ssni-297</a>
PA0002247271	SSNI-573	<a href="https://missav.com/dm44/en/ssni-573">https://missav.com/dm44/en/ssni-573</a>
PA0002247272	SSNI-644	<a href="https://missav.com/dm45/en/ssni-644">https://missav.com/dm45/en/ssni-644</a> <a href="https://missav.com/dm39/en/ssni-644-uncensored-leak">https://missav.com/dm39/en/ssni-644-uncensored-leak</a>
PA0002247273	SSNI-645	<a href="https://missav.com/dm47/en/ssni-645">https://missav.com/dm47/en/ssni-645</a> <a href="https://missav.com/dm1/en/ssni-645-uncensored-leak">https://missav.com/dm1/en/ssni-645-uncensored-leak</a>
PA0002247278	SSNI-646	<a href="https://missav.com/dm46/en/ssni-646">https://missav.com/dm46/en/ssni-646</a>

		<a href="https://missav.com/dm39/en/ssni-646-uncensored-leak">https://missav.com/dm39/en/ssni-646-uncensored-leak</a>
PA0002247281	SSNI-730	<a href="https://missav.com/dm45/en/ssni-730">https://missav.com/dm45/en/ssni-730</a> <a href="https://missav.com/dm38/en/ssni-730-uncensored-leak">https://missav.com/dm38/en/ssni-730-uncensored-leak</a>
PA0002247282	MEYD-435	<a href="https://missav.com/dm44/en/meyd-435">https://missav.com/dm44/en/meyd-435</a>
PA0002247283	SSNI-731	<a href="https://missav.com/dm59/en/ssni-731">https://missav.com/dm59/en/ssni-731</a>
PA0002247284	SSNI-737	<a href="https://missav.com/dm44/en/ssni-737">https://missav.com/dm44/en/ssni-737</a>
PA0002247287	WANZ-562	<a href="https://missav.com/dm57/en/wanz-562">https://missav.com/dm57/en/wanz-562</a>

**Domain Name: MYAV.COM**

**Registrations: 50**

<b>Copyright Registration #</b>	<b>Title</b>	<b>Infringing Link</b>
PA0002245467	IPX-394	<a href="https://myav.com/dm57/en/ipx-394">https://myav.com/dm57/en/ipx-394</a>
PA0002245468	IPX-398	<a href="https://myav.com/dm64/en/ipx-398">https://myav.com/dm64/en/ipx-398</a>
PA0002246147	SSNI-703	<a href="https://myav.com/dm45/en/ssni-703">https://myav.com/dm45/en/ssni-703</a> <a href="https://myav.com/dm39/en/ssni-703-uncensored-leak">https://myav.com/dm39/en/ssni-703-uncensored-leak</a>
PA0002246148	SSNI-683	<a href="https://myav.com/dm32/en/ssni-683">https://myav.com/dm32/en/ssni-683</a>
PA0002246149	SSNI-655	<a href="https://myav.com/dm44/en/ssni-655">https://myav.com/dm44/en/ssni-655</a>
PA0002246150	SSNI-205	<a href="https://myav.com/dm44/en/ssni-205">https://myav.com/dm44/en/ssni-205</a> <a href="https://myav.com/dm39/en/ssni-205-uncensored-leak">https://myav.com/dm39/en/ssni-205-uncensored-leak</a>
PA0002246151	SSNI-678	<a href="https://myav.com/dm47/en/ssni-678">https://myav.com/dm47/en/ssni-678</a>
PA0002246152	SSNI-182	<a href="https://myav.com/dm44/en/ssni-182">https://myav.com/dm44/en/ssni-182</a>
PA0002246153	SSNI-152	<a href="https://myav.com/dm53/en/ssni-152">https://myav.com/dm53/en/ssni-152</a> <a href="https://myav.com/dm16/en/ssni-152-uncensored-leak">https://myav.com/dm16/en/ssni-152-uncensored-leak</a>
PA0002246209	SSNI-675	<a href="https://myav.com/dm45/en/ssni-675">https://myav.com/dm45/en/ssni-675</a> <a href="https://myav.com/dm39/en/ssni-675-uncensored-leak">https://myav.com/dm39/en/ssni-675-uncensored-leak</a>
PA0002246213	SSNI-135	<a href="https://myav.com/dm39/en/ssni-135">https://myav.com/dm39/en/ssni-135</a>
PA0002246223	SSNI-127	<a href="https://myav.com/dm31/en/ssni-127">https://myav.com/dm31/en/ssni-127</a>
PA0002246228	SSNI-117	<a href="https://myav.com/dm31/en/ssni-117">https://myav.com/dm31/en/ssni-117</a>
PA0002246234	SSNI-101	<a href="https://myav.com/dm45/en/ssni-101">https://myav.com/dm45/en/ssni-101</a> <a href="https://myav.com/dm39/en/ssni-101-uncensored-leak">https://myav.com/dm39/en/ssni-101-uncensored-leak</a>
PA0002246244	SSNI-012	<a href="https://myav.com/dm26/en/ssni-012">https://myav.com/dm26/en/ssni-012</a>
PA0002246265	MIAE-332	<a href="https://myav.com/dm40/en/miae-332">https://myav.com/dm40/en/miae-332</a>
PA0002246268	SSNI-687	<a href="https://myav.com/dm44/en/ssni-687">https://myav.com/dm44/en/ssni-687</a>
PA0002246271	MIAD-963	<a href="https://myav.com/dm48/en/miad-963">https://myav.com/dm48/en/miad-963</a>
PA0002246273	MIDE-430	<a href="https://myav.com/dm52/en/mide-430">https://myav.com/dm52/en/mide-430</a>
PA0002246278	SSNI-674	<a href="https://myav.com/dm47/en/ssni-674">https://myav.com/dm47/en/ssni-674</a> <a href="https://myav.com/dm39/en/ssni-674-uncensored-leak">https://myav.com/dm39/en/ssni-674-uncensored-leak</a>
PA0002246282	SSNI-663	<a href="https://myav.com/dm45/en/ssni-663">https://myav.com/dm45/en/ssni-663</a>
PA0002246285	MIDE-677	<a href="https://myav.com/dm59/en/mide-677">https://myav.com/dm59/en/mide-677</a>
PA0002246288	IPX-113	<a href="https://myav.com/dm44/en/ipx-113">https://myav.com/dm44/en/ipx-113</a>
PA0002246289	IPX-222	<a href="https://myav.com/dm57/en/ipx-222">https://myav.com/dm57/en/ipx-222</a>
PA0002246290	IPX-362	<a href="https://myav.com/dm58/en/ipx-362">https://myav.com/dm58/en/ipx-362</a>
PA0002246291	SSNI-143	<a href="https://myav.com/dm45/en/ssni-143">https://myav.com/dm45/en/ssni-143</a>
PA0002246292	SSNI-657	<a href="https://myav.com/dm46/en/ssni-657">https://myav.com/dm46/en/ssni-657</a>

PA0002246294	SSNI-192	<a href="https://myav.com/dm48/en/ssni-192">https://myav.com/dm48/en/ssni-192</a> <a href="https://myav.com/en/ssni-192-uncensored-leak">https://myav.com/en/ssni-192-uncensored-leak</a>
PA0002246297	MIDE-678	<a href="https://myav.com/dm57/en/mide-678">https://myav.com/dm57/en/mide-678</a> <a href="https://myav.com/dm26/en/mide-678-uncensored-leak">https://myav.com/dm26/en/mide-678-uncensored-leak</a>
PA0002246298	MIDE-683	<a href="https://myav.com/dm57/en/mide-683">https://myav.com/dm57/en/mide-683</a>
PA0002247253	SSNI-054	<a href="https://myav.com/dm45/en/ssni-054">https://myav.com/dm45/en/ssni-054</a> <a href="https://myav.com/en/ssni-192-uncensored-leak">https://myav.com/en/ssni-192-uncensored-leak</a>
PA0002247254	SSNI-207	<a href="https://myav.com/dm44/en/ssni-207">https://myav.com/dm44/en/ssni-207</a>
PA0002247255	SSNI-214	<a href="https://myav.com/dm56/en/ssni-214">https://myav.com/dm56/en/ssni-214</a>
PA0002247257	SSNI-215	<a href="https://myav.com/dm44/en/ssni-215">https://myav.com/dm44/en/ssni-215</a>
PA0002247258	SSNI-221	<a href="https://myav.com/dm45/en/ssni-221">https://myav.com/dm45/en/ssni-221</a> <a href="https://myav.com/dm39/en/ssni-221-uncensored-leak">https://myav.com/dm39/en/ssni-221-uncensored-leak</a>
PA0002247260	SSNI-236	<a href="https://myav.com/dm44/en/ssni-236">https://myav.com/dm44/en/ssni-236</a>
PA0002247264	SSNI-242	<a href="https://myav.com/dm45/en/ssni-242">https://myav.com/dm45/en/ssni-242</a>
PA0002247265	SSNI-266	<a href="https://myav.com/dm44/en/ssni-266">https://myav.com/dm44/en/ssni-266</a> <a href="https://myav.com/en/ssni-266-uncensored-leak">https://myav.com/en/ssni-266-uncensored-leak</a>
PA0002247266	SSNI-254	<a href="https://myav.com/dm44/en/ssni-254">https://myav.com/dm44/en/ssni-254</a>
PA0002247268	SSNI-268	<a href="https://myav.com/dm44/en/ssni-268">https://myav.com/dm44/en/ssni-268</a> <a href="https://myav.com/dm39/en/ssni-268-uncensored-leak">https://myav.com/dm39/en/ssni-268-uncensored-leak</a>
PA0002247270	SSNI-297	<a href="https://myav.com/dm57/en/ssni-297">https://myav.com/dm57/en/ssni-297</a>
PA0002247271	SSNI-573	<a href="https://myav.com/dm44/en/ssni-573">https://myav.com/dm44/en/ssni-573</a>
PA0002247272	SSNI-644	<a href="https://myav.com/dm45/en/ssni-644">https://myav.com/dm45/en/ssni-644</a> <a href="https://myav.com/dm39/en/ssni-644-uncensored-leak">https://myav.com/dm39/en/ssni-644-uncensored-leak</a>
PA0002247273	SSNI-645	<a href="https://myav.com/dm47/en/ssni-645">https://myav.com/dm47/en/ssni-645</a> <a href="https://myav.com/dm1/en/ssni-645-uncensored-leak">https://myav.com/dm1/en/ssni-645-uncensored-leak</a>
PA0002247278	SSNI-646	<a href="https://myav.com/dm46/en/ssni-646">https://myav.com/dm46/en/ssni-646</a> <a href="https://myav.com/dm39/en/ssni-646-uncensored-leak">https://myav.com/dm39/en/ssni-646-uncensored-leak</a>
PA0002247281	SSNI-730	<a href="https://myav.com/dm45/en/ssni-730">https://myav.com/dm45/en/ssni-730</a> <a href="https://myav.com/dm38/en/ssni-730-uncensored-leak">https://myav.com/dm38/en/ssni-730-uncensored-leak</a>
PA0002247282	MEYD-435	<a href="https://myav.com/dm44/en/meyd-435">https://myav.com/dm44/en/meyd-435</a>
PA0002247283	SSNI-731	<a href="https://myav.com/dm59/en/ssni-731">https://myav.com/dm59/en/ssni-731</a>
PA0002247284	SSNI-737	<a href="https://myav.com/dm44/en/ssni-737">https://myav.com/dm44/en/ssni-737</a>
PA0002247287	WANZ-562	<a href="https://myav.com/dm57/en/wanz-562">https://myav.com/dm57/en/wanz-562</a>

**Domain Name: MISSAV789.COM**

**Registrations: 50**

Copyright Registration #	Title	Infringing Link
PA0002245467	IPX-394	<a href="https://missav789.com/dm57/en/ipx-394">https://missav789.com/dm57/en/ipx-394</a>
PA0002245468	IPX-398	<a href="https://missav789.com/dm64/en/ipx-398">https://missav789.com/dm64/en/ipx-398</a>
PA0002246147	SSNI-703	<a href="https://missav789.com/dm45/en/ssni-703">https://missav789.com/dm45/en/ssni-703</a> <a href="https://missav789.com/dm39/en/ssni-703-uncensored-leak">https://missav789.com/dm39/en/ssni-703-uncensored-leak</a>
PA0002246148	SSNI-683	<a href="https://missav789.com/dm32/en/ssni-683">https://missav789.com/dm32/en/ssni-683</a>
PA0002246149	SSNI-655	<a href="https://missav789.com/dm44/en/ssni-655">https://missav789.com/dm44/en/ssni-655</a>
PA0002246150	SSNI-205	<a href="https://missav789.com/dm44/en/ssni-205">https://missav789.com/dm44/en/ssni-205</a>



		<a href="https://missav789.com/dm39/en/ssni-205-uncensored-leak">https://missav789.com/dm39/en/ssni-205-uncensored-leak</a>
PA0002246151	SSNI-678	<a href="https://missav789.com/dm47/en/ssni-678">https://missav789.com/dm47/en/ssni-678</a>
PA0002246152	SSNI-182	<a href="https://missav789.com/dm44/en/ssni-182">https://missav789.com/dm44/en/ssni-182</a>
PA0002246153	SSNI-152	<a href="https://missav789.com/dm53/en/ssni-152">https://missav789.com/dm53/en/ssni-152</a> <a href="https://missav789.com/dm16/en/ssni-152-uncensored-leak">https://missav789.com/dm16/en/ssni-152-uncensored-leak</a>
PA0002246209	SSNI-675	<a href="https://missav789.com/dm45/en/ssni-675">https://missav789.com/dm45/en/ssni-675</a> <a href="https://missav789.com/dm39/en/ssni-675-uncensored-leak">https://missav789.com/dm39/en/ssni-675-uncensored-leak</a>
PA0002246213	SSNI-135	<a href="https://missav789.com/dm39/en/ssni-135">https://missav789.com/dm39/en/ssni-135</a>
PA0002246223	SSNI-127	<a href="https://missav789.com/dm31/en/ssni-127">https://missav789.com/dm31/en/ssni-127</a>
PA0002246228	SSNI-117	<a href="https://missav789.com/dm31/en/ssni-117">https://missav789.com/dm31/en/ssni-117</a>
PA0002246234	SSNI-101	<a href="https://missav789.com/dm45/en/ssni-101">https://missav789.com/dm45/en/ssni-101</a> <a href="https://missav789.com/dm39/en/ssni-101-uncensored-leak">https://missav789.com/dm39/en/ssni-101-uncensored-leak</a>
PA0002246244	SSNI-012	<a href="https://missav789.com/dm26/en/ssni-012">https://missav789.com/dm26/en/ssni-012</a>
PA0002246265	MIAE-332	<a href="https://missav789.com/dm40/en/miae-332">https://missav789.com/dm40/en/miae-332</a>
PA0002246268	SSNI-687	<a href="https://missav789.com/dm44/en/ssni-687">https://missav789.com/dm44/en/ssni-687</a>
PA0002246271	MIAD-963	<a href="https://missav789.com/dm48/en/miad-963">https://missav789.com/dm48/en/miad-963</a>
PA0002246273	MIDE-430	<a href="https://missav789.com/dm52/en/mide-430">https://missav789.com/dm52/en/mide-430</a>
PA0002246278	SSNI-674	<a href="https://missav789.com/dm47/en/ssni-674">https://missav789.com/dm47/en/ssni-674</a> <a href="https://missav789.com/dm39/en/ssni-674-uncensored-leak">https://missav789.com/dm39/en/ssni-674-uncensored-leak</a>
PA0002246282	SSNI-663	<a href="https://missav789.com/dm45/en/ssni-663">https://missav789.com/dm45/en/ssni-663</a>
PA0002246285	MIDE-677	<a href="https://missav789.com/dm59/en/mide-677">https://missav789.com/dm59/en/mide-677</a>
PA0002246288	IPX-113	<a href="https://missav789.com/dm44/en/ipx-113">https://missav789.com/dm44/en/ipx-113</a>
PA0002246289	IPX-222	<a href="https://missav789.com/dm57/en/ipx-222">https://missav789.com/dm57/en/ipx-222</a>
PA0002246290	IPX-362	<a href="https://missav789.com/dm58/en/ipx-362">https://missav789.com/dm58/en/ipx-362</a>
PA0002246291	SSNI-143	<a href="https://missav789.com/dm45/en/ssni-143">https://missav789.com/dm45/en/ssni-143</a>
PA0002246292	SSNI-657	<a href="https://missav789.com/dm46/en/ssni-657">https://missav789.com/dm46/en/ssni-657</a>
PA0002246294	SSNI-192	<a href="https://missav789.com/dm48/en/ssni-192">https://missav789.com/dm48/en/ssni-192</a> <a href="https://missav789.com/en/ssni-192-uncensored-leak">https://missav789.com/en/ssni-192-uncensored-leak</a>
PA0002246297	MIDE-678	<a href="https://missav789.com/dm57/en/mide-678">https://missav789.com/dm57/en/mide-678</a> <a href="https://missav789.com/dm26/en/mide-678-uncensored-leak">https://missav789.com/dm26/en/mide-678-uncensored-leak</a>
PA0002246298	MIDE-683	<a href="https://missav789.com/dm57/en/mide-683">https://missav789.com/dm57/en/mide-683</a>
PA0002247253	SSNI-054	<a href="https://missav789.com/dm45/en/ssni-054">https://missav789.com/dm45/en/ssni-054</a> <a href="https://missav789.com/en/ssni-192-uncensored-leak">https://missav789.com/en/ssni-192-uncensored-leak</a>
PA0002247254	SSNI-207	<a href="https://missav789.com/dm44/en/ssni-207">https://missav789.com/dm44/en/ssni-207</a>
PA0002247255	SSNI-214	<a href="https://missav789.com/dm56/en/ssni-214">https://missav789.com/dm56/en/ssni-214</a>
PA0002247257	SSNI-215	<a href="https://missav789.com/dm44/en/ssni-215">https://missav789.com/dm44/en/ssni-215</a>
PA0002247258	SSNI-221	<a href="https://missav789.com/dm45/en/ssni-221">https://missav789.com/dm45/en/ssni-221</a> <a href="https://missav789.com/dm39/en/ssni-221-uncensored-leak">https://missav789.com/dm39/en/ssni-221-uncensored-leak</a>
PA0002247260	SSNI-236	<a href="https://missav789.com/dm44/en/ssni-236">https://missav789.com/dm44/en/ssni-236</a>
PA0002247264	SSNI-242	<a href="https://missav789.com/dm45/en/ssni-242">https://missav789.com/dm45/en/ssni-242</a>
PA0002247265	SSNI-266	<a href="https://missav789.com/dm44/en/ssni-266">https://missav789.com/dm44/en/ssni-266</a> <a href="https://missav789.com/en/ssni-266-uncensored-leak">https://missav789.com/en/ssni-266-uncensored-leak</a>
PA0002247266	SSNI-254	<a href="https://missav789.com/dm44/en/ssni-254">https://missav789.com/dm44/en/ssni-254</a>
PA0002247268	SSNI-268	<a href="https://missav789.com/dm44/en/ssni-268">https://missav789.com/dm44/en/ssni-268</a> <a href="https://missav789.com/dm39/en/ssni-268-uncensored-leak">https://missav789.com/dm39/en/ssni-268-uncensored-leak</a>

PA0002247270	SSNI-297	<a href="https://missav789.com/dm57/en/ssni-297">https://missav789.com/dm57/en/ssni-297</a>
PA0002247271	SSNI-573	<a href="https://missav789.com/dm44/en/ssni-573">https://missav789.com/dm44/en/ssni-573</a>
PA0002247272	SSNI-644	<a href="https://missav789.com/dm45/en/ssni-644">https://missav789.com/dm45/en/ssni-644</a> <a href="https://missav789.com/dm39/en/ssni-644-uncensored-leak">https://missav789.com/dm39/en/ssni-644-uncensored-leak</a>
PA0002247273	SSNI-645	<a href="https://missav789.com/dm47/en/ssni-645">https://missav789.com/dm47/en/ssni-645</a> <a href="https://missav789.com/dm1/en/ssni-645-uncensored-leak">https://missav789.com/dm1/en/ssni-645-uncensored-leak</a>
PA0002247278	SSNI-646	<a href="https://missav789.com/dm46/en/ssni-646">https://missav789.com/dm46/en/ssni-646</a> <a href="https://missav789.com/dm39/en/ssni-646-uncensored-leak">https://missav789.com/dm39/en/ssni-646-uncensored-leak</a>
PA0002247281	SSNI-730	<a href="https://missav789.com/dm45/en/ssni-730">https://missav789.com/dm45/en/ssni-730</a> <a href="https://missav789.com/dm38/en/ssni-730-uncensored-leak">https://missav789.com/dm38/en/ssni-730-uncensored-leak</a>
PA0002247282	MEYD-435	<a href="https://missav789.com/dm44/en/meyd-435">https://missav789.com/dm44/en/meyd-435</a>
PA0002247283	SSNI-731	<a href="https://missav789.com/dm59/en/ssni-731">https://missav789.com/dm59/en/ssni-731</a>
PA0002247284	SSNI-737	<a href="https://missav789.com/dm44/en/ssni-737">https://missav789.com/dm44/en/ssni-737</a>
PA0002247287	WANZ-562	<a href="https://missav789.com/dm57/en/wanz-562">https://missav789.com/dm57/en/wanz-562</a>

**Domain Name: EIGHTCHA.COM**

**Registrations: 50**

Copyright Registration #	Title	Infringing Link
PA0002245467	IPX-394	<a href="https://eightcha.com/ipx-394/cover.jpg?class=normal">https://eightcha.com/ipx-394/cover.jpg?class=normal</a>
PA0002245468	IPX-398	<a href="https://eightcha.com/ipx-398/cover.jpg?class=normal">https://eightcha.com/ipx-398/cover.jpg?class=normal</a>
PA0002246147	SSNI-703	<a href="https://eightcha.com/ssni-703/cover.jpg?class=normal">https://eightcha.com/ssni-703/cover.jpg?class=normal</a>
PA0002246148	SSNI-683	<a href="https://eightcha.com/ssni-683/cover.jpg?class=normal">https://eightcha.com/ssni-683/cover.jpg?class=normal</a>
PA0002246149	SSNI-655	<a href="https://eightcha.com/ssni-655/cover.jpg?class=normal">https://eightcha.com/ssni-655/cover.jpg?class=normal</a>
PA0002246150	SSNI-205	<a href="https://eightcha.com/ssni-205/cover.jpg?class=normal">https://eightcha.com/ssni-205/cover.jpg?class=normal</a>
PA0002246151	SSNI-678	<a href="https://eightcha.com/ssni-678/cover.jpg?class=normal">https://eightcha.com/ssni-678/cover.jpg?class=normal</a>
PA0002246152	SSNI-182	<a href="https://eightcha.com/ssni-182/cover.jpg?class=normal">https://eightcha.com/ssni-182/cover.jpg?class=normal</a>
PA0002246153	SSNI-152	<a href="https://eightcha.com/ssni-152/cover.jpg?class=normal">https://eightcha.com/ssni-152/cover.jpg?class=normal</a>
PA0002246209	SSNI-675	<a href="https://eightcha.com/ssni-675/cover.jpg?class=normal">https://eightcha.com/ssni-675/cover.jpg?class=normal</a>
PA0002246213	SSNI-135	<a href="https://eightcha.com/ssni-135/cover.jpg?class=normal">https://eightcha.com/ssni-135/cover.jpg?class=normal</a>
PA0002246223	SSNI-127	<a href="https://eightcha.com/ssni-127/cover.jpg?class=normal">https://eightcha.com/ssni-127/cover.jpg?class=normal</a>
PA0002246228	SSNI-117	<a href="https://eightcha.com/ssni-117/cover.jpg?class=normal">https://eightcha.com/ssni-117/cover.jpg?class=normal</a>
PA0002246234	SSNI-101	<a href="https://eightcha.com/ssni-101/cover.jpg?class=normal">https://eightcha.com/ssni-101/cover.jpg?class=normal</a>
PA0002246244	SSNI-012	<a href="https://eightcha.com/ssni-012/cover.jpg?class=normal">https://eightcha.com/ssni-012/cover.jpg?class=normal</a>
PA0002246265	MIAE-332	<a href="https://eightcha.com/miae-332/cover.jpg?class=normal">https://eightcha.com/miae-332/cover.jpg?class=normal</a>
PA0002246268	SSNI-687	<a href="https://eightcha.com/ssni-687/cover.jpg?class=normal">https://eightcha.com/ssni-687/cover.jpg?class=normal</a>
PA0002246271	MIAD-963	<a href="https://eightcha.com/miad-963/cover.jpg?class=normal">https://eightcha.com/miad-963/cover.jpg?class=normal</a>
PA0002246273	MIDE-430	<a href="https://eightcha.com/mide-430/cover.jpg?class=normal">https://eightcha.com/mide-430/cover.jpg?class=normal</a>
PA0002246278	SSNI-674	<a href="https://eightcha.com/ssni-674/cover.jpg?class=normal">https://eightcha.com/ssni-674/cover.jpg?class=normal</a>
PA0002246282	SSNI-663	<a href="https://eightcha.com/ssni-663/cover.jpg?class=normal">https://eightcha.com/ssni-663/cover.jpg?class=normal</a>
PA0002246285	MIDE-677	<a href="https://eightcha.com/mide-677/cover.jpg?class=normal">https://eightcha.com/mide-677/cover.jpg?class=normal</a>
PA0002246288	IPX-113	<a href="https://eightcha.com/ipx-113/cover.jpg?class=normal">https://eightcha.com/ipx-113/cover.jpg?class=normal</a>
PA0002246289	IPX-222	<a href="https://eightcha.com/ipx-222/cover.jpg?class=normal">https://eightcha.com/ipx-222/cover.jpg?class=normal</a>
PA0002246290	IPX-362	<a href="https://eightcha.com/ipx-362/cover.jpg?class=normal">https://eightcha.com/ipx-362/cover.jpg?class=normal</a>
PA0002246291	SSNI-143	<a href="https://eightcha.com/ssni-143/cover.jpg?class=normal">https://eightcha.com/ssni-143/cover.jpg?class=normal</a>

PA0002246292	SSNI-657	<a href="https://eightcha.com/ssni-657/cover.jpg?class=normal">https://eightcha.com/ssni-657/cover.jpg?class=normal</a>
PA0002246294	SSNI-192	<a href="https://eightcha.com/ssni-192/cover.jpg?class=normal">https://eightcha.com/ssni-192/cover.jpg?class=normal</a>
PA0002246297	MIDE-678	<a href="https://eightcha.com/mide-678/cover.jpg?class=normal">https://eightcha.com/mide-678/cover.jpg?class=normal</a>
PA0002246298	MIDE-683	<a href="https://eightcha.com/mide-683/cover.jpg?class=normal">https://eightcha.com/mide-683/cover.jpg?class=normal</a>
PA0002247253	SSNI-054	<a href="https://eightcha.com/ssni-054/cover.jpg?class=normal">https://eightcha.com/ssni-054/cover.jpg?class=normal</a>
PA0002247254	SSNI-207	<a href="https://eightcha.com/ssni-207/cover.jpg?class=normal">https://eightcha.com/ssni-207/cover.jpg?class=normal</a>
PA0002247255	SSNI-214	<a href="https://eightcha.com/ssni-214/cover.jpg?class=normal">https://eightcha.com/ssni-214/cover.jpg?class=normal</a>
PA0002247257	SSNI-215	<a href="https://eightcha.com/ssni-215/cover.jpg?class=normal">https://eightcha.com/ssni-215/cover.jpg?class=normal</a>
PA0002247258	SSNI-221	<a href="https://eightcha.com/ssni-221/cover.jpg?class=normal">https://eightcha.com/ssni-221/cover.jpg?class=normal</a>
PA0002247260	SSNI-236	<a href="https://eightcha.com/ssni-236/cover.jpg?class=normal">https://eightcha.com/ssni-236/cover.jpg?class=normal</a>
PA0002247264	SSNI-242	<a href="https://eightcha.com/ssni-242/cover.jpg?class=normal">https://eightcha.com/ssni-242/cover.jpg?class=normal</a>
PA0002247265	SSNI-266	<a href="https://eightcha.com/ssni-266/cover.jpg?class=normal">https://eightcha.com/ssni-266/cover.jpg?class=normal</a>
PA0002247266	SSNI-254	<a href="https://eightcha.com/ssni-254/cover.jpg?class=normal">https://eightcha.com/ssni-254/cover.jpg?class=normal</a>
PA0002247268	SSNI-268	<a href="https://eightcha.com/ssni-268/cover.jpg?class=normal">https://eightcha.com/ssni-268/cover.jpg?class=normal</a>
PA0002247270	SSNI-297	<a href="https://eightcha.com/ssni-297/cover.jpg?class=normal">https://eightcha.com/ssni-297/cover.jpg?class=normal</a>
PA0002247271	SSNI-573	<a href="https://eightcha.com/ssni-573/cover.jpg?class=normal">https://eightcha.com/ssni-573/cover.jpg?class=normal</a>
PA0002247272	SSNI-644	<a href="https://eightcha.com/ssni-644/cover.jpg?class=normal">https://eightcha.com/ssni-644/cover.jpg?class=normal</a>
PA0002247273	SSNI-645	<a href="https://eightcha.com/ssni-645/cover.jpg?class=normal">https://eightcha.com/ssni-645/cover.jpg?class=normal</a>
PA0002247278	SSNI-646	<a href="https://eightcha.com/ssni-646/cover.jpg?class=normal">https://eightcha.com/ssni-646/cover.jpg?class=normal</a>
PA0002247281	SSNI-730	<a href="https://eightcha.com/ssni-730/cover.jpg?class=normal">https://eightcha.com/ssni-730/cover.jpg?class=normal</a>
PA0002247282	MEYD-435	<a href="https://eightcha.com/meyd-435/cover.jpg?class=normal">https://eightcha.com/meyd-435/cover.jpg?class=normal</a>
PA0002247283	SSNI-731	<a href="https://eightcha.com/ssni-731/cover.jpg?class=normal">https://eightcha.com/ssni-731/cover.jpg?class=normal</a>
PA0002247284	SSNI-737	<a href="https://eightcha.com/ssni-737/cover.jpg?class=normal">https://eightcha.com/ssni-737/cover.jpg?class=normal</a>
PA0002247287	WANZ-562	<a href="https://eightcha.com/wanz-562/cover.jpg?class=normal">https://eightcha.com/wanz-562/cover.jpg?class=normal</a>

**Domain Name: FIVETIU.COM**

**Registrations: 50**

Copyright Registration #	Title	Infringing Link
PA0002245467	IPX-394	<a href="https://fivetiu.com/ipx-394/cover.jpg?class=normal">https://fivetiu.com/ipx-394/cover.jpg?class=normal</a>
PA0002245468	IPX-398	<a href="https://fivetiu.com/ipx-398/cover.jpg?class=normal">https://fivetiu.com/ipx-398/cover.jpg?class=normal</a>
PA0002246147	SSNI-703	<a href="https://fivetiu.com/ssni-703/cover.jpg?class=normal">https://fivetiu.com/ssni-703/cover.jpg?class=normal</a>
PA0002246148	SSNI-683	<a href="https://fivetiu.com/ssni-683/cover.jpg?class=normal">https://fivetiu.com/ssni-683/cover.jpg?class=normal</a>
PA0002246149	SSNI-655	<a href="https://fivetiu.com/ssni-655/cover.jpg?class=normal">https://fivetiu.com/ssni-655/cover.jpg?class=normal</a>
PA0002246150	SSNI-205	<a href="https://fivetiu.com/ssni-205/cover.jpg?class=normal">https://fivetiu.com/ssni-205/cover.jpg?class=normal</a>
PA0002246151	SSNI-678	<a href="https://fivetiu.com/ssni-678/cover.jpg?class=normal">https://fivetiu.com/ssni-678/cover.jpg?class=normal</a>
PA0002246152	SSNI-182	<a href="https://fivetiu.com/ssni-182/cover.jpg?class=normal">https://fivetiu.com/ssni-182/cover.jpg?class=normal</a>
PA0002246153	SSNI-152	<a href="https://fivetiu.com/ssni-152/cover.jpg?class=normal">https://fivetiu.com/ssni-152/cover.jpg?class=normal</a>
PA0002246209	SSNI-675	<a href="https://fivetiu.com/ssni-675/cover.jpg?class=normal">https://fivetiu.com/ssni-675/cover.jpg?class=normal</a>
PA0002246213	SSNI-135	<a href="https://fivetiu.com/ssni-135/cover.jpg?class=normal">https://fivetiu.com/ssni-135/cover.jpg?class=normal</a>
PA0002246223	SSNI-127	<a href="https://fivetiu.com/ssni-127/cover.jpg?class=normal">https://fivetiu.com/ssni-127/cover.jpg?class=normal</a>
PA0002246228	SSNI-117	<a href="https://fivetiu.com/ssni-117/cover.jpg?class=normal">https://fivetiu.com/ssni-117/cover.jpg?class=normal</a>
PA0002246234	SSNI-101	<a href="https://fivetiu.com/ssni-101/cover.jpg?class=normal">https://fivetiu.com/ssni-101/cover.jpg?class=normal</a>
PA0002246244	SSNI-012	<a href="https://fivetiu.com/ssni-012/cover.jpg?class=normal">https://fivetiu.com/ssni-012/cover.jpg?class=normal</a>
PA0002246265	MIAE-332	<a href="https://fivetiu.com/miae-332/cover.jpg?class=normal">https://fivetiu.com/miae-332/cover.jpg?class=normal</a>



PA0002246268	SSNI-687	<a href="https://fivetiu.com/ssni-687/cover.jpg?class=normal">https://fivetiu.com/ssni-687/cover.jpg?class=normal</a>
PA0002246271	MIAD-963	<a href="https://fivetiu.com/miad-963/cover.jpg?class=normal">https://fivetiu.com/miad-963/cover.jpg?class=normal</a>
PA0002246273	MIDE-430	<a href="https://fivetiu.com/mide-430/cover.jpg?class=normal">https://fivetiu.com/mide-430/cover.jpg?class=normal</a>
PA0002246278	SSNI-674	<a href="https://fivetiu.com/ssni-674/cover.jpg?class=normal">https://fivetiu.com/ssni-674/cover.jpg?class=normal</a>
PA0002246282	SSNI-663	<a href="https://fivetiu.com/ssni-663/cover.jpg?class=normal">https://fivetiu.com/ssni-663/cover.jpg?class=normal</a>
PA0002246285	MIDE-677	<a href="https://fivetiu.com/mide-677/cover.jpg?class=normal">https://fivetiu.com/mide-677/cover.jpg?class=normal</a>
PA0002246288	IPX-113	<a href="https://fivetiu.com/ipx-113/cover.jpg?class=normal">https://fivetiu.com/ipx-113/cover.jpg?class=normal</a>
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PA0002247273	SSNI-645	<a href="https://fivetiu.com/ssni-645/cover.jpg?class=normal">https://fivetiu.com/ssni-645/cover.jpg?class=normal</a>
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PA0002247282	MEYD-435	<a href="https://fivetiu.com/meyd-435/cover.jpg?class=normal">https://fivetiu.com/meyd-435/cover.jpg?class=normal</a>
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PA0002247287	WANZ-562	<a href="https://fivetiu.com/wanz-562/cover.jpg?class=normal">https://fivetiu.com/wanz-562/cover.jpg?class=normal</a>

# Exhibit B

## EXHIBIT B

## Trademarks / Service Marks

エスワン	はじめ企画	Hunter
ムーディーズ	ミニム	ROYAL
アイデアポケット	もっこりテレビ	ジャックポットシステム
プレミアム	胸キュン喫茶	アパッチ
マドンナ	本中	ATOM
アタッカーズ	未満	ゴールデンタイム
溜池ゴロー	無垢	お夜食カンパニー
kira☆kira	乱丸	GO!GO! お手当ちゃん
kawaii*	DMMオリジナル	しろうとエチチ.ch
MUTEKI	変態紳士倶楽部	素人天然水
CROSS	蜜月	肉女子キュンキュン♪
オペラ	コア	#シロウト逸材発掘～仕事帰りのヤリモくちゃん
ヴィ	ワンズファクトリー	SSR
美	MTK	Buzzシロウト
BeFree	Love Place	神級ビッチ
E-BODY	team ZERO	日払いちゃん
Fitch	D☆Collection	#職業女子
エムズビデオグループ	ナンパ JAPAN	チョロすぎQ
オッパイ	ビビアン	しろうと速報
ROOKIE	キャンディ	素人ムクムク
イエロー	えむっ娘㊿	路地裏ぱんぱん
ズッコンバッコン	ヤマン伝説	巨乳は飲み物。
アナと花子	クカ	しろうと屋
エアコントロール	ぐりーんあっぷる	素人盗撮倶楽部
ダスッ!		

素人ぱいぱい	破天荒	オルちゃん
ねっとりフリックス	素人ムクムク-痴-	S1
東京恋マチ女子	レゾレボVR	
東狂ハメンジャーズ	少女A	
MOON LIGHTING	寝取らせ屋	
アトビジョンVR	鳥パコ	
ギャルpay	ヤリサーちゃん。	
素人ムクムク-塩-	パコなまゲートウェ〜イ	
浮遊僧	ぽこちん・ざ・ろっく！	
裏垢ドットえす	オモチカエリ	
#放課後ラブホ	素人ムクムク-人妻-	
即ハメちゃん	素人ムクムク-弱点-	
U-ra	ハーレムジャーニー	
YOASOBIちゃん	素人ムクムク-職-	
しろうとヤッホー	レンタルなんもしないけ	
1day娘	ど勃起はする人	
既婚者の会	素人ムクムク-塩PP-	
素人ムクムク-礼ぶ-	素人ムクムク-クスリ-	
白昼夢	陰娘	
しろうとじゃっぶ	平成浪漫ポルノ	
素人ムクムク-W-	シンマママッチング	
ホームエロ〜ン	とりあえずナマで！	
素人パコパコ-H-	女ひとり、一人飲み。	
ビッチーズ	FAIR&WAY	
素人ChuChu	素人ムクムク-部活-	
Iff速報	スナッパ娘	